

19 November 2004

Mr. Marc Marandola  
Plant Manager  
VICTORY FINISHING TECHNOLOGIES, INC.  
145 Globe Street  
Providence, RI 02903

Dear Mr. Marandola:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of fuel burning equipment at your facility, located at 145 Globe Street, Providence, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1821).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7011.

Sincerely,

Douglas L. McVay  
Associate Supervising Engineer  
Office of Air Resources

cc: Providence Building Official

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

*Victory Finishing Technologies, Inc.*

APPROVAL NO. 1821

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

*Victory Finishing Technologies, Inc.*

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**For the following:**

*A Cleaver Brooks 12.56 MMBtu/hr boiler, Model No. CBLE 200-300. The fuel burning equipment shall be fired with either natural gas or No. 2 fuel oil containing 0.3 percent sulfur, by weight, or less.*

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**Located at:**

*145 Globe Street, Providence*

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**This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Victory Finishing Technologies, Inc.* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.**

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**Stephen Majkut, Chief  
Office of Air Resources**

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**Date of Issuance**

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

**Permit Conditions and Emission Limitations**

Victory Finishing Technologies, Inc.

**Approval No. 1820**

A. Emission Limitations

1. Natural Gas Firing

a. Nitrogen Oxides (as nitrogen dioxide (NO<sub>2</sub>))

The emission rate of nitrogen oxides discharged to the atmosphere from the boiler shall not exceed 0.036 lbs per million BTU heat input or 0.44 lb/hr, whichever is more stringent.

b. Carbon Monoxide (CO)

The emission rate of carbon monoxide discharged to the atmosphere from the boiler shall not exceed 0.109 lbs per million BTU heat input or 0.46 lb/hr, whichever is more stringent.

c. Total Nonmethane Hydrocarbons (NMHC)

The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from the boiler shall not exceed 0.016 lbs per million BTU heat input or 0.2 lb/hr, whichever is more stringent.

2. Oil Firing

a. Nitrogen Oxides (as nitrogen dioxide (NO<sub>2</sub>))

The emission rate of nitrogen oxides discharged to the atmosphere from the boiler shall not exceed 0.19 lbs per million BTU heat input or 2.33 lbs/hr whichever is more stringent.

b. Carbon Monoxide (CO)

The emission rate of carbon monoxide discharged to the atmosphere from the boiler shall not exceed 0.07 lbs per million BTU heat input or 0.88 lbs/hr whichever is more stringent.

c. Sulfur Dioxide (SO<sub>2</sub>)

- (i) All fuel burned in the boiler shall contain no more than 0.3 percent sulfur by weight.
- (ii) The emission rate of sulfur dioxide discharged to the atmosphere from the boiler shall not exceed 3.79 lbs/hr.

d. Particulate Matter

The emission rate of particulate matter discharged to the atmosphere from the boiler shall not exceed 0.024 lbs per million BTU heat input or 0.302 lbs/hr whichever is more stringent.

e. Total Nonmethane Hydrocarbons (NMHC)

The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from the boiler shall not exceed 0.03 lbs per million BTU heat input or 0.377 lbs/hr, whichever is more stringent.

- 3. Visible emissions from the boiler exhaust flue shall not exceed 10% opacity (six-minute average).

B. Operating Requirements

- 1. The maximum firing rate of the boiler shall not exceed 89.7 gal/hr of No. 2 fuel oil or 12,440 ft<sup>3</sup>/hr of natural gas.
- 2. The flue gas recirculation system for the boiler shall be in full operation whenever the boiler is in operation.
- 3. The owner/operator shall conduct a complete annual inspection of the flue gas recirculation system and its components. The owner/operator shall check for proper operation and compare all internal and external control and drive linkage settings with those established by Cleaver Brooks. The owner/operator shall note and correct any deviations prior to operating the boiler after each such annual inspection.

C. Continuous Monitors

- 1. Continuous emission monitoring equipment shall be installed, operated and maintained for opacity when the boiler is operating on fuel oil.

2. Natural gas and fuel oil flow for the boiler shall be continuously measured and recorded.

D. Fuel Oil Testing

1. Compliance with fuel oil sulfur limits may be determined based on a certification from the fuel supplier.
2. Fuel supplier certification shall include the following information:
  - a. The name of the oil supplier;
  - b. The sulfur content of the oil;
  - c. The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil; specifically including whether the oil was sampled as delivered to Victory Finishing Technologies, Inc. or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility or another location;
  - d. The method used to determine the sulfur content of the oil.
3. As an alternative to fuel supplier certification, the owner/operator may elect to sample the fuel prior to combustion. Sampling and analysis shall be conducted for the oil in the initial tank of oil to be fired in the boiler and after each new shipment of oil is received. Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted.
4. Each fuel supplier certification or each fuel oil analysis must demonstrate that the oil for the Cleaver Brooks boiler contains 0.5 percent sulfur by weight or less.

E. Record Keeping and Reporting

1. The owner/operator shall notify the Office of Air Resources in writing of the date of actual start-up of the boiler no later than fifteen days after such date.
2. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the total quantity of No. 2 fuel oil and natural gas combusted in the Cleaver Brooks boiler. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
3. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:

- a. Change the representation of the facility in the application.
- b. Alter the applicability of any state or federal air pollution rules or regulations.
- c. Result in the violation of any terms or conditions of this permit.
- d. Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

4. The owner/operator shall maintain records of the annual visual inspection of the flue gas recirculation system and its components.
5. The owner/operator shall retain copies of all fuel supplier certifications or fuel oil analyses for each calendar quarter. These records shall be made accessible for review by the Office of Air Resources or EPA. This quarterly record shall include a certified statement, signed by the owner/operator, that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.
6. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
7. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information:
  - a. The name and location of the facility;
  - b. The subject source(s) that caused the noncompliance with the permit term;
  - c. The time and date of first observation of the incident of noncompliance;
  - d. The cause and expected duration of the incident of noncompliance;

- e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate.

The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.

8. All records required in this permit shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

F. Other Permit Conditions

1. To the extent consistent with the requirements of this permit and applicable federal and state laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application dated 5 October 2004.
2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigation any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
3. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate this boiler in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.
4. The existing 12.5 MMBtu/hr York Shipley, Model EA-300 boiler shall be removed from service and rendered inoperable effective with the startup of the 12.56 MMBtu/hr Cleaver Brooks, Model CBLE 200-300 boiler.
5. The boiler is subject to the requirements of the Federal New Source Performance Standards 40 CFR 60, Subparts A (General Provisions), and Dc (Small Industrial-Commercial-Institutional Steam Generating Units). Compliance with all applicable provisions of these regulations is required.