

9 November 2007

Mr. John Fish
President
Millwork One, Inc.
33 Minnesota Avenue
Warwick, RI 02888

Dear Mr. Fish:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for the installation of process equipment at your 60 Kenney Drive facility in Cranston.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2011).

Should you have any questions, I can be reached at 222-2808, extension 7011.

Sincerely,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Cranston Building Official
Kelly Cowan, Woodard & Curran

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

MINOR SOURCE PERMIT

MILLWORK ONE, INC.

APPROVAL NO. 2011

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

Millwork One, Inc.

For the following:

The installation of a spray booth for wood coating operations located at 60 Kenney Drive in Cranston.

Located at: *60 Kenney Drive, Cranston*

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 *Millwork One, 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.

Stephen Majkut, Chief
Office of Air Resources

Date of issuance

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

Permit Conditions and Emission Limitations

MILLWORK ONE, INC.

APPROVAL NO. 2011

A. Emission Limitations

1. Volatile Organic Compound (VOC) Emission Limitations

- a. The total quantity of volatile organic compound emissions discharged to the atmosphere from all operations, for the entire facility, shall not exceed 4,000 pounds per calendar month, based upon a 12 month rolling average.
- b. If the emission limitation in A.1.a is exceeded and the total quantity of volatile organic compound emissions discharged to the atmosphere exceeds 4,166 pounds per calendar month, based upon a 12 month rolling average, the applicable requirements in Air Pollution Control Regulation 35 shall immediately apply.

2. Hazardous Air Pollutant (HAP) and Air Toxic Emission Limitations

- a. The total quantity of HAP emissions discharged to the atmosphere from all operations, for the entire facility, shall not exceed 1,500 pounds of any one (1) HAP or 4,000 pounds of any combination of HAPs per calendar month, based upon a 12 month rolling average.
- b. The emissions of listed toxic air contaminants discharged to the atmosphere from the entire facility shall not exceed the limitations in Table 1. The limitations shown in pounds per year are calculated on a 12-month rolling average basis.
- c. The total quantity of emissions discharged to the atmosphere from the entire facility, for any listed toxic air contaminant not identified in Table 1 shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.
- d. If the emission limitation in A.2.a is exceeded, and the total quantity of HAP emissions discharged to the atmosphere exceeds 1,666 pounds per calendar month of any single HAP or 4,166 pounds per calendar month of

any combination of HAPs, based upon a 12 month rolling average, the emission limitations specified in Air Pollution Control Regulation 35, Subsections 35.3 and 35.4 shall immediately apply.

C. Operating Requirements

1. The spray booth shall be equipped, at all times, with overspray filter media that treat all exhausted air prior to discharge to the atmosphere.
2. A gauge shall be installed and maintained to indicate the static pressure differential across the overspray filter media.

D. Recordkeeping and Reporting

1. The owner/operator shall collect and record all of the following information each month that the spray booth is operating:
 - a. The name, identification number and amount used of each coating, as applied; and,
 - b. The name, identification number and amount of each finishing, gluing and washoff material used each month at the facility; and,
 - c. The mass of VOC and VHAP per volume (excluding water and exempt compounds), as applied, for each coating used; and,
 - d. A certified product data sheet (CPDS) showing the VOC and VHAP content of each finishing, gluing and washoff material used at the facility; and,
 - e. The type and amount of solvent used as thinners and in cleaning operations at the facility.
2. The owner/operator shall, on a monthly basis, no later than 10 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from all operations for the entire facility. Monthly and 12-month rolling averages shall be calculated. 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, within 15 days, whenever the total quantity of VOCs discharged to the atmosphere from all operations, for the entire facility exceeds 4,000 pounds per calendar month, based upon a 12 month rolling average.

4. The owner/operator shall, on a monthly basis, no later than 10 days after the first of the month, determine the total quantity of HAPs discharged to the atmosphere from all operations, for the entire facility. Monthly and 12-month rolling averages shall be calculated. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
5. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of HAPs discharged to the atmosphere from all operations, for the entire facility exceeds 1,500 pounds of any single HAP or 4,000 pounds of any combination of HAPs per calendar month, based upon a 12 month rolling average.
6. The owner/operator shall determine the total quantity of each listed toxic air contaminant in Table 1 discharged to the atmosphere from the entire facility. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
 - a. For pollutants with a pound/hour or pound/day limitation – determine emissions on a daily basis.
 - b. For pollutants with a pounds/year limitation – determine emissions on a monthly basis, no later than 10 days after the first of the month. Monthly and 12-month rolling averages shall be calculated and used for comparison with emission limitations.
7. The owner/operator shall notify the Office of Air Resources in writing whenever the total quantity of a listed toxic air contaminant, discharged to the atmosphere from the entire facility, exceed the limitations in Table 1. For the purposes of the Table 1 listed toxic air contaminants, the following notification timelines apply:
 - a. For pollutants with a pound/hour or pound/day limitation – written notification is required within 24 hours.
 - b. For pollutants with a pounds/year limitation – written notification is required within 15 days.
8. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant not identified in Table 1, exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9.
9. The owner/operator shall notify the Office of Air Resources in writing of the actual date of startup of the new spray booth located at 60 Kenney Drive within 15 calendar days after the startup date.

10. 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.
 - 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.

11. 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;
 - f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.

12. 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.

E. 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 28 September 2007.
2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all reasonable times for the purpose of inspecting any air pollution source, investigating 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 the facility 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.

Table 1. Emission Limitations

Pollutant	Limitation		
	pounds/hour	pounds/day	pounds/year
Acetone	1897	45,528 ¹	
2-Butoxyethanol	316		48,000 ⁵
Dibutyl phthalate	63	569	
Ethylbenzene		1897	
Ethylene Glycol	31		18,000 ⁶
Formaldehyde	1	24 ²	277
Isopropyl Alcohol	94		
Methanol	948		18,000 ⁶
MEK	316	7584 ³	
MIBK		5691	
Toluene	126	758	18,000 ⁶
Xylene	126	3024 ⁴	18,000 ⁶

¹The lb/hr limit times 24 is more stringent than the daily limit (56,917) back calculated from the AAL.

²The lb/hr limit times 24 is more stringent than the daily limit (37) back calculated from the AAL.

³The lb/hr limit times 24 is more stringent than the daily limit (9486) back calculated from the AAL.

⁴The lb/hr limit times 24 is more stringent than the daily limit (5691) back calculated from the AAL.

⁵VOC limitation (48,000) is more stringent than that back calculated from the AAL (49,992).

⁶HAP limitation (18,000) is more stringent than that back calculated from the AAL.