

5 February 2009

Michael Friedman, President
Wood Precision
10 New Road
East Providence, RI 02914

Dear Mr. Friedman:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for a minor source permit for process equipment at your 10 New Road, East Providence facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 2044 & 2045).

I can be reached at 222-2808, extension 7110 if there are any questions.

Sincerely,

Ruth A. Gold
Senior Air Quality Specialist
Office of Air Resources

cc: East Providence Building Official

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

MINOR SOURCE PERMIT

WOOD PRECISION

APPROVAL NOS. 2044 & 2045

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

Wood Precision

For the following:

The installation of two spray booths for wood coating operations.

Located at: *10 New Road, East Providence*

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 *Wood Precision* 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.

Douglas L. McVay, Acting 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

WOOD PRECISION

APPROVAL NOS. 2044 & 2045

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, "Control of Volatile Organic Compounds and Volatile Hazardous Air Pollutants from Wood Products Manufacturing Operations" 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. 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. The total quantity of formaldehyde discharged to the atmosphere from all operations, for the entire facility, shall not exceed 306 pounds per year.
- d. The total quantity of dioctyl phthalate discharged to the atmosphere from all operations, for the entire facility, shall not exceed 1531 pounds per year.

- e. The total quantity of toluene diisocyanate discharged to the atmosphere from all operations, for the entire facility, shall not exceed 268 pounds per year.

B. Operating Requirements

1. Each spray booth shall be equipped with overspray filter media at all times when spray coating operations are being conducted.
2. A gauge shall be installed and maintained to indicate the static pressure differential across the overspray filter media.
3. All materials containing VOC shall be stored in containers that are closed at all times except when material is being added or removed.
4. Conventional air spray guns shall not be used to apply a coating. Conventional air spray means a spray coating method in which the coating is atomized by mixing it with compressed air at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization. Airless, air assisted airless, and electrostatic spray technologies are not considered conventional air spray methods.

C. Record Keeping and Reporting

1. The owner/operator shall collect and record all of the following information each month:
 - a. The name, identification number and amount used of each coating, as applied; and,
 - b. The name, identification number and amount of each material containing VOC used 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, including cleanup.

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 quantity of VOC discharged to the atmosphere from all operations for the entire facility including cleanup, 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, on a monthly basis, no later than 10 days after the first of the month, determine the total quantity of formaldehyde, dioctyl phthalate and toluene diisocyanate 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.
7. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of formaldehyde discharged to the atmosphere from all operations for the entire facility exceeds 306 lbs. per year.
8. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of dioctyl phthalate discharged to the atmosphere from all operations for the entire facility exceeds 1531 lbs. per year.
9. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of toluene diisocyanate discharged to the atmosphere from all operations for the entire facility exceeds 268 lbs. per year.
10. The owner/operator shall notify the Office of Air Resources in writing of the actual date of startup of each new spray booth within 15 calendar days after the startup date.
11. 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.

12. 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.
13. The owner/operator shall notify the Office of Air Resources of any record showing noncompliance with the terms of this permit or any other air pollution control rule or regulation applicable to the coating operation by sending a copy of the record to the Office of Air Resources within 30 days following the occurrence.
14. 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;
 - a. 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.

- b. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.
15. 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.

D. 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.
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.
4. The emission and dispersion characteristics of all sources of listed toxic air contaminants at the facility shall be consistent with the parameters used in the air quality modeling to demonstrate that the emissions of each listed toxic air contaminant from the facility does not cause an impact, at or beyond the property line of the facility, which exceeds the Acceptable Ambient Level for that substance. The Office of Air Resources, in its sole discretion, may reopen this minor source permit if it determines that the emission and dispersion characteristics have changed significantly and that the emission limitations in this permit must be revised to ensure compliance with Air Pollution Control Regulation No. 22.