

24 February 2003

Michael V. D'Ambra, President
D'Ambra Construction Co., Inc.
800 Jefferson Boulevard
Warwick, RI 02887

Dear Mr. D'Ambra:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of a baghouse at your facility located at 800 Jefferson Boulevard, Warwick, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1150-1151 and 1743).

During the course of our review of your application, we determined that the baghouse was installed in 1999. D'Ambra Construction Company, Inc. failed to obtain a preconstruction permit prior to the installation of this equipment as required by RI Air Pollution Control Regulation No. 9.

Be advised that issuance of this permit does not limit or otherwise preclude the RI DEM from pursuing enforcement actions to address the violations stated above.

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

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

MINOR SOURCE PERMIT

D'AMBRA CONSTRUCTION COMPANY, INC.

APPROVAL NOS. 1150-1151 & 1743

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

D'Ambra Construction Company, Inc.

For the following:

Permit revision to include the installation of an Aeropulse pulse jet baghouse, Model

No. M-741-12(6)-TFS-N to control particulate emissions from the rotary drum dryer

(Approval No. 1743).

Located at: *800 Jefferson Boulevard, Warwick*

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 *D'Ambra Construction Company, 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 Condition and Emission Limitations

D'AMBRA CONSTRUCTION COMPANY

APPROVAL NOS. 1150-1151 and 1743

(February 2003 revision)

A. Emission Limitations

1. Particulates

- a. The concentration of particulate matter discharged to the atmosphere from the baghouse stack shall not exceed 0.04 grains per dry standard cubic foot.
- b. The emission rate of particulate matter discharged to the atmosphere from the baghouse stack shall not exceed 4.96 pounds per hour.
- c. Visible emissions from the baghouse stack shall not exceed 10 percent opacity (six-minute average).

2. Volatile Organic Compounds

- a. The destruction efficiency of the afterburner shall be a minimum of 98 percent.
- b. The emission rate of volatile organic compounds discharged to the atmosphere shall not exceed 51.0 pounds per hour.

B. Operating Requirements

1. Particulate emissions generated from the rotary drum dryer shall be captured, contained, and routed to the baghouse for treatment prior to discharge to the atmosphere.
2. The afterburner temperature shall be maintained at or above 1460°F at all times.
3. This equipment shall be used to process soils contaminated with virgin petroleum distillates only, including, but not limited to, gasoline, kerosene, and Nos. 2 through 6 fuel oils.

4. The maximum feed rate of contaminated soil to the rotary drum dryer shall not exceed 75 tons per hour.
5. The level of petroleum hydrocarbons in the soil charged to the rotary drum dryer shall not exceed 17,000 ppm.
6. Processing of contaminated soil in the rotary drum dryer shall be limited to between the hours of 6:30 AM and 5:00 PM, Monday through Saturday.
7. Contaminated soil shall not be fed to the rotary drum dryer when hot mix asphalt is being produced.
8. All reasonable precautions shall be taken to prevent visible, fugitive emissions from any of the equipment.

C. Continuous monitors

1. The pressure drop across the baghouse shall be monitored continuously. Pressure drop shall be checked a minimum of once per day, and the date, time, and measurement shall be recorded.
2. The owner/operator shall install, operate, and maintain equipment to continuously monitor and record the operating temperature of the afterburner.
3. In the event of a malfunction of a continuous monitor, the applicable parameter shall be recorded manually, once per hour, until the continuous monitor is back in service.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the daily pressure drop measurement of the baghouse.
2. The owner/operator shall maintain the following records concerning the contaminated soil to be processed in the rotary kiln:
 - a. Dates the material was received and approximate date it was processed in the rotary kiln.
 - b. The quantity of material received and information concerning the origin of the material.
 - c. A copy of an analysis of the material sufficient to demonstrate that the material is not a hazardous waste and to show the level of contamination of the material.

- d. For material blended on site, a copy of an analysis of the material both before and after blending to show that the level of petroleum hydrocarbons does not exceed 17,000 ppm.
3. The owner/operator shall compile records, on a monthly basis, that includes the following:
 - a. The quantity of material processed in the rotary kiln for that month.
 - b. The quantity of volatile organic compounds input to the rotary kiln for that month.
4. 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.
5. 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.

6. The owner/operator shall notify the Office of Air Resources of any noncompliance with the terms of this permit, in writing, within 5 days of the occurrence.
7. All records required as a condition of this approval must be made available to the Office of Air Resources or its representative upon request. These records must be maintained for a minimum of five years after the date of each record.

E. Fugitive Dust

1. Vehicles transporting aggregate or contaminated soil shall be covered with a tarpaulin or similar dust resistant membrane.
2. Vehicle operating speeds shall be controlled to minimize generation of dust.
3. All open storage areas and or piles of soil, aggregates, or any other dust producing material shall be covered or watered down as necessary to prevent generation of dust.
4. The facility property shall be swept a minimum of once per day to prevent fugitive particulate emissions. Mechanized sweeping equipment shall be equipped with a dust collection or dust suppression system which is maintained in good operating condition and is operated continuously while the sweeping equipment is in use.
5. All reasonable precautions shall be taken to prevent fugitive particulate emissions from the storage, handling, or transporting of the contaminated soil.

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.
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, 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. There shall be no bypassing of the air pollution control equipment at any time.
4. All reasonable precautions shall be taken to prevent fugitive volatile organic compound emissions from the storage, handling, or transporting of the contaminated soil. Such precautions shall include, but not be limited to, processing the contaminated soil as soon as possible from receipt and/or covering storage piles with a tarp to minimize evaporation of contaminants.
5. A visolite test of the baghouse shall be performed three times per year on or about 1 April, 1 July and 1 October. A written report of the results of the test and any corrective action taken or to be taken shall be submitted to the Office of Air Resources within 10 days of completion of the test.
6. 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.

G. Malfunctions

1. A malfunction of any air pollution control system that would result in the exceedance of any emission limitation applicable to this facility will necessitate the shutdown of the facility. The facility must remain shutdown until the malfunction has been identified and corrected.
2. The owner/operator may seek to establish that a malfunction of any air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the owner/operator must demonstrate to the Office of Air Resources that:
 - a. The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error;
 - b. The malfunction was not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
 - c. Repairs were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable.
 - d. All possible steps were taken to minimize emissions during the period of time that the repairs were performed.
 - e. Emissions during the period of time that the repairs were performed will not:
 - (1) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and
 - (2) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard.
 - f. The reasons that it would be impossible or impractical to cease the source operation during said period.

- g. The owner/operator's action in response to the excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence.

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken.

The owner/operator shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction.