

28 February 2006

Mr. Craig A. Pickell
Bullard Abrasives
6 Carol Drive
Lincoln, RI 02865

Dear Mr. Pickell:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for a minor source permit for your facility located at 6 Carol Drive in Lincoln, RI.

Enclosed is a minor source permit issued pursuant to our review of your request (Approval No. 1883).

I can be reached at 222-2808, extension 7011 if there are any questions.

Sincerely,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Lincoln Building Official

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

MINOR SOURCE PERMIT

BULLARD ABRASIVES

APPROVAL NO. 1883

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

Bullard Abrasives

For the following:

The installation and operation of curing ovens, mixers, presses, a roller coater and other miscellaneous equipment for the manufacture of abrasive cutting wheels and small grinding wheels.

Located at: *6 Carol Drive, Lincoln*

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 *Bullard Abrasives* 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

BULLARD ABRASIVES

APPROVAL NO. 1883

A. Emission Limitations

1. Volatile Organic Compounds (VOC)

The total quantity of volatile organic compound emissions discharged to the atmosphere from resin processing operations shall not exceed 7.0 pounds per 1000 lbs of resin used.

2. Hazardous Air Pollutant (HAP)

The total quantity of HAP emissions discharged to the atmosphere from resin processing operations shall not exceed 1,333 pounds of any combination of HAPs per calendar month based upon a 12 month rolling average.

3. Listed Toxic Air Contaminant

a. The total quantity of phenol emissions discharged to the atmosphere from resin processing operations shall not exceed:

(1) 29.0 pounds per hour; and,

(2) 15,800 pounds in any consecutive 12-month period.

b. The total quantity of ammonia emissions discharged to the atmosphere from resin processing operations shall not exceed:

(1) 4.9 pounds per hour; and,

(2) 30,220 pounds in any consecutive 12-month period.

4. Any air contaminant or combination of air contaminants discharged to the atmosphere from the facility shall not create an objectionable odor beyond the property line of this facility. Odor evaluations shall be conducted according to the provisions of Air Pollution Control Regulation No. 17.

B. Operating Requirements

1. The owner/operator shall limit the total quantity of resin used in the entire facility to 2,300,000 pounds or less for any consecutive 12-month period.
2. The owner/operator shall maintain the covers on the presses and roller coater to minimize fugitive emissions of VOCs.
3. Each mixer shall be totally enclosed while mixing is taking place to minimize fugitive emissions of VOCs.

C. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records:
 - a. The name, type, and identification number of each material containing VOC and/or HAP used at the facility, including but not limited to each liquid or solid resin.
 - b. A material safety data sheet (MSDS) or equivalent for each material containing VOC and/or HAP used at the facility, showing the VOC and HAP content.
 - c. For each material containing VOC and/or HAP used at the facility, the quantity used and the amount of waste generated (in gallons or pounds) at the facility on a monthly basis.
2. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine and record the total quantity of resin used in the entire facility for the previous 12 months.
3. The owner/operator shall notify the Office of Air Resources whenever the total quantity of resin used exceeds 2,300,000 pounds for any consecutive 12-month period.
4. The owner/operator shall, on a monthly basis, no later than 5 business days after the first of the month, determine the total quantity of HAPs discharged to the atmosphere from resin processing operations conducted at the facility. 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 resin

processing operations conducted at the facility exceeds 1,333 pounds per calendar month based upon a 12 month rolling average.

6. The owner/operator shall, on a monthly basis, no later than 5 business days after the first of the month, determine the total quantity of phenol and ammonia discharged to the atmosphere from resin processing operations conducted at the facility. 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 phenol or ammonia discharged to the atmosphere from resin processing operations conducted at the facility exceeds any of the following limitations:

	pounds per hour	pounds in any consecutive 12-month period
Phenol	29	15,800
Ammonia	4.9	30,220

8. 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.
9. The owner/operator shall notify the Office of Air Resources, in writing, of the anticipated date of the initial start-up of the mixers, presses, roller coater and curing ovens not more than 60 days nor less than 30 days of the anticipated date.
10. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual start-up of the mixers, presses, roller coater and curing ovens no later than 15 days after such date.
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. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment covered under this approval 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.

13. The owner/operator shall notify the Office of Air Resources in writing, on or before 15 April of the following calendar year, whenever the total quantity of any listed toxic air contaminant discharged to the atmosphere during a calendar year, from the entire facility, exceeds the minimum quantity for that contaminant as specified in Table III of Air Pollution Control Regulation No. 22. This provision does not include the listed toxic air contaminants phenol and ammonia.
14. 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, state, and local 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. 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 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 emission limitations must be revised and/or added to this permit to ensure compliance with Air Pollution Control Regulation No. 22.

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