

15 June 2009

Ms. Deborah Tuton
Rhode Island Convention Center
One Sabin Street
Providence, RI 02903

Dear Ms. Tuton:

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 Service Drive, Providence, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 2058 & 2059).

During the course of our review of your application, we determined that the boilers were installed in 1993. Rhode Island Convention Center failed to obtain a preconstruction permit prior to the installation of this equipment as required by RI Air Pollution Control Regulation No. 9.

The issuance of this minor source permit will now bring Rhode Island Convention Center into compliance with the requirement to obtain a preconstruction permit for these boilers. The issuance of this permit does not limit or otherwise preclude the RI DEM from pursuing enforcement actions to address the failure to obtain a preconstruction permit prior to the installation of the equipment.

If there are any questions concerning this permit, please contact me at 222-2808, extension 7028.

Sincerely,

Aleida M. Whitney
Air Quality Specialist
Office of Air Resources

cc: Providence Building Official
Don C. DiCristofaro, CCM – Blue Sky Environmental LLC

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

MINOR SOURCE PERMIT

RHODE ISLAND CONVENTION CENTER

APPROVAL NOS. 2058 & 2059

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

Rhode Island Convention Center

For the following:

Installation of two Superior Boiler Works 12.75 MMBtu/hr firetube boilers, Model No.

F16-G-75-R4140L-E2.30H-IRI-FM. The boilers will be fired with natural gas.

Located at: *Service Drive, 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 *Rhode Island Convention Center* 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

Rhode Island Convention Center

APPROVAL NOS. 2058 & 2059

A. Emission Limitations

1. Natural Gas Firing

a. Nitrogen Oxides (as nitrogen dioxide (NO₂))

The emission rate of nitrogen oxides discharged to the atmosphere from each boiler shall not exceed 0.10 lb per million BTU heat input or 1.25 lbs/hr, whichever is more stringent.

b. Carbon Monoxide (CO)

The emission rate of carbon monoxide discharged to the atmosphere from each boiler shall not exceed 0.08 lb per million BTU heat input or 1.05 lbs/hr, whichever is more stringent.

c. Total Nonmethane Hydrocarbons (NMHC)

The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from each boiler shall not exceed 0.005 lb per million BTU heat input or 0.07 lb/hr, whichever is more stringent.

2. Visible emissions from the boiler stack shall not exceed 10% opacity (6-minute average).

B. Operating Requirements

1. The maximum firing rate of each boiler shall not exceed 12,499 ft³/hr of natural gas.

C. Record Keeping and Reporting

1. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the total quantity of natural gas combusted in

each boiler. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.

2. The owner/operator shall notify the Office of Air Resources in writing of any 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 of 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.

3. 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.
4. 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.
5. 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 approval 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. 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. Each 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.