

21 March 2011

Mr. Carl McLean
Oldcastle Lawn & Garden, Inc.
49 Stilson Road
Wyoming, RI 02898

Dear Mr. McLean:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the operation of fuel burning equipment at your facility located at 35A Stilson Road, Wyoming.

During the course of our review of your application, we determined that the Peterson Grinder and associated Caterpillar 1000 HP diesel engine was installed in October 2009 and began operating in February 2010. Old Castle Lawn & Garden, Inc. 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 Old Castle Lawn & Garden, Inc. into compliance with the requirement to obtain a preconstruction permit.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1999 & 2124).

The permit conditions and emission limitations in this permit also incorporate and include those in Approval No. 1999 issued on 1 August 2007. Hereinafter the design, construction, and operation of all the equipment addressed in this approval shall be subject to the permit conditions and emission limitations contained in this minor source permit.

The Office of Air Resources has been notified, as discussed at your facility's inspection on 15 April 2010, of a change in ownership of your facility from Jolly Gardener Products, Inc. to Oldcastle Lawn & Garden. This letter acknowledges that change as it applies to your facility located at 49 Stilson Road, Wyoming, RI. This fulfills your obligation to notify the Office of Air Resources of a transfer of any air pollution permits. This transfer applies only to Approval No. 1999.

Pursuant to the provisions of subsection 9.6.10 of Air Pollution Control Regulation No. 9, entitled, "Air Pollution Control Permits", effective with this transfer, Oldcastle Lawn & Garden shall be responsible for complying with all applicable air pollution control regulations and permit conditions.

The Office of Air Resources understands that Oldcastle Lawn & Garden will continue to operate the existing equipment at the facility and no change to the process will occur.

Oldcastle Lawn & Garden shall notify the Office of Air Resources, in writing, of any planned physical or operational change to the equipment that would:

1. Change the representation of the facility in the application.
2. Alter the applicability of any state or federal air pollution rules or regulations.
3. Result in the violation of any terms or conditions of the permit.
4. 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 change which may result in an increased emission rate of any air contaminant shall have the prior approval of the Director.

This letter does not relieve Oldcastle Lawn & Garden from compliance with applicable state or federal air pollution control rules and regulations.

Should you have any questions I can be reached at 401-222-2808, extension 7110.

Sincerely,

Ruth Gold
Principal Air Quality Specialist
Office of Air Resources

cc: Richmond Building Official

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

MINOR SOURCE PERMIT

OLDCASTLE LAWN & GARDEN

APPROVAL NOS. 1999 & 2124

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

Oldcastle Lawn & Garden

For the following:

The installation of a Caterpillar Model No. 3412E 1,000 HP diesel engine (Approval No. 2124) which supplies power to a Peterson Grinder. The engine shall be fired with diesel fuel oil containing 15 ppm sulfur, by weight, or less.

Located at: *35A Stilson Road, Wyoming*

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 *Oldcastle Lawn & Garden* 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

OLDCASTLE LAWN & GARDEN

APPROVAL NOS. 1999 & 2124

A. Emission Limitations

1. CW Tub Grinder – 900 HP engine

a. Nitrogen Oxides (as Nitrogen Dioxide (NO₂))

The emission rate of nitrogen oxides discharged to the atmosphere from the 900 HP engine shall not exceed 10.89 grams per brake horsepower-hour (g/bhp-hr) unless the rate of emissions is less than 21.6 lbs/hr.

b. Carbon Monoxide (CO)

The emission rate of carbon monoxide discharged to the atmosphere from the 900 HP engine shall not exceed 2.49 g/bhp-hr unless the rate of emissions is less than 4.95 lbs/hr.

c. Total Nonmethane Hydrocarbons (NMHC)

The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from the 900 HP engine shall not exceed 0.32 g/bhp-hr unless the rate of emissions is less than 0.63 lbs/hr.

d. Sulfur Dioxide (SO₂)

(1) The sulfur content of all diesel fuel burned in the 900 HP engine shall not exceed 15 ppm by weight.

(2) The emission rate of sulfur dioxide discharged to the atmosphere from the 900 HP engine shall not exceed 0.01 lbs/hr.

e. Particulate Matter (PM)

The emission rate of particulate matter discharged from the 900 HP engine exhaust shall not exceed 0.32 g/bhp-hr unless the rate of emissions is less than 0.63 lbs/hr.

2. Peterson Grinder – 1000 HP engine

a. Nitrogen Oxides (as Nitrogen Dioxide (NO₂))

The emission rate of nitrogen oxides discharged to the atmosphere from the 1000 HP engine shall not exceed 8.23 g/bhp-hr unless the rate of emissions is less than 18.1 lbs/hr.

b. Carbon Monoxide (CO)

The emission rate of carbon monoxide discharged to the atmosphere from the 1000 HP engine shall not exceed 0.67 g/bhp-hr unless the rate of emissions is less than 1.5 lbs/hr.

c. Total Nonmethane Hydrocarbons (NMHC)

The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from the 1000 HP engine shall not exceed 0.93 g/bhp-hr unless the rate of emissions is less than 0.21 lbs/hr.

d. Sulfur Dioxide (SO₂)

(1) The sulfur content of all diesel fuel burned in the 1000 HP engine shall not exceed 15 ppm by weight.

(2) The emission rate of sulfur dioxide discharged to the atmosphere from the 1000 HP engine shall not exceed 0.01 lbs/hr.

e. Particulate Matter (PM)

The emission rate of particulate matter discharged from the 1000 HP engine exhaust shall not exceed 0.14 g/bhp-hr unless the rate of emissions is less than 0.30 lbs/hr.

3. Opacity

Visible emissions from any engine at the facility shall not exceed 10% opacity except for a period or periods aggregating no more than three minutes in any one hour. This visible emission limitation shall not apply during startup of an engine. Engine startup shall be defined as the first ten minutes of firing following the initiation of firing.

4. Nitrogen oxides (NO_x)

The total quantity of NO_x emissions discharged to the atmosphere from the entire facility shall not exceed 98,000 pounds in any consecutive 12-month period.

B. Operating Requirements

1. The maximum firing rate for the 900 HP engine shall not exceed 51 gallons per hour.
2. The maximum firing rate for the 1000 HP engine shall not exceed 51 gallons per hour.
3. The combined quantity of diesel fuel oil combusted at the facility, including the 407 HP Volvo engine-generator set, shall be limited to 154,000 gallons or less for any consecutive 12-month period.

C. Continuous Monitoring

1. Each engine shall be equipped with a non-resettable elapsed time meter to indicate, in cumulative hours, the elapsed engine operating time.

D. Fuel Oil Testing

1. Compliance with the diesel fuel sulfur limits may be determined based on a certification from the fuel supplier. Fuel supplier certifications shall include the following information:
 - a. The name of the fuel supplier;
 - b. The sulfur content of the fuel from which the shipment came or the shipment itself;
 - c. The location of the fuel when the sample was drawn for analysis to determine the sulfur content of the fuel, specifically including whether the fuel was sampled as delivered to Oldcastle Lawn & Garden or whether the sample was drawn from fuel in storage at the fuel supplier's facility or another location;
 - d. The method used to determine the sulfur content of the fuel.
2. As an alternative to fuel supplier certification, the owner/operator may elect to sample the fuel prior to combustion. Sampling and analysis shall be conducted for the fuel in the initial tank(s) of fuel to be fired in the engine and after each new shipment of fuel is received. Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any fuel is combusted.

3. Each fuel supplier certification or each fuel oil analysis must demonstrate that the fuel oil contains 15 ppm sulfur by weight or less.

E. Record Keeping and Reporting

1. The owner/operator shall, on a monthly basis, no later than 15 days after the first of each month, determine and record the hours of operation for each engine and fuel use for the entire facility for the previous 12 months. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources or its authorized representative and EPA upon request.
2. The owner/operator shall, on a monthly basis, no later than 15 days after the first of each month, determine the total fuel used by the engines during the previous 12 months.
3. The owner/operator shall notify the Office of Air Resources in writing within 30 days, whenever the combined quantity of diesel fuel oil combusted at the facility exceeds 154,000 gallons in any consecutive 12-month period.
4. The owner/operator shall maintain copies of all fuel supplier certifications or fuel analyses and these copies shall be made accessible for review by the Office of Air Resources or its authorized representative and EPA. These records shall include a certified statement, signed by the owner/operator of the facility, that the records represent all of the fuel combusted at the facility.
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, which may result in an increased emission rate of any air contaminant, shall be subject to the approval of the Director.

6. 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.
7. 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.
8. 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.

F. Fugitive Dust

1. No visible fugitive emissions shall leave the property from the grinders, associated sources and service roads within the facility. Compliance with the standard of no visible fugitive emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using 40 CFR 60, Appendix A, Test Method 22.
2. Opacity of visible emissions from the grinders shall not exceed 15 percent (6-minute average) as determined using 40 CFR 60, Appendix A, Test Method 9.
3. Service roads within the facility shall be maintained and controlled in such a manner as to minimize the potential for the generation of fugitive dust emissions.

4. All open storage areas and/or piles of material which may produce fugitive dust shall be covered, watered down, or implement other precautions, as necessary, to prevent generation of dust.
5. Adequate precautions shall be taken to prevent fugitive dust emissions from the storage, handling or transporting of material capable of releasing dust.

G. 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 or its authorized representatives and EPA 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. Approval No. 1998 issued by the Office of Air Resources on 1 August 2007 for the installation of an 800 HP Caterpillar Model No. 3412 diesel engine which supplied power to a Diamond Z Tub Grinder is revoked.

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