

8 May 2014

Mr. Jack Goodison
Chief Executive Officer
J. Goodison Company, Inc.
244 Burlingham Avenue
North Kingstown, RI 02852

Dear Mr. Goodison:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your minor source permit application for a marine repair facility and air pollution control equipment at your facility located at 244 Burlingham Avenue in North Kingstown.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 2248 & 2249).

If there are any questions concerning this permit, please contact me at 401-222-2808, extension 7028 or by email at aleida.whitney@dem.ri.gov.

Sincerely,

Aleida M. Whitney
Senior Air Quality Specialist
Office of Air Resources

cc: Glenn Almquist - Woodard & Curran
Chris Braga – J. Goodison
State Building Commissioners Office

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

MINOR SOURCE PERMIT

J. GOODISON COMPANY, INC.

APPROVAL NOs. 2248 & 2249

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

J. Goodison Company, Inc.

For the following:

Marine repair and refit operations which include sandblasting, welding and surface coating of marine vessel components (Approval No. 2248). PM emissions from sandblasting will be controlled by an AIREX 20,000 cfm dust collector, Model No. DCC 36S (Approval No. 2249).

Located at: *244 Burlingham Avenue, North Kingstown*

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 *J. Goodison 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.

**Douglas McVay, 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

J. GOODISON COMPANY, INC.

APPROVAL NOs. 2248 & 2249

I. The following requirements are applicable to marine repair and refit operations including surface coating of miscellaneous metal parts as defined in Air Pollution Control Regulation No. 19.

A. Emission Limitations

1. The total quantity of volatile organic compound (VOC) emissions discharged to the atmosphere from all surface coating operations shall not exceed 1,666 pounds in any one calendar month.
2. If the emission limitation in I.A.1 is exceeded, the emission limitations specified in Air Pollution Control Regulation 19, Subsection 19.3.1 shall immediately apply.
3. The owner/operator shall not cause or allow the application of any marine coating with an as-applied volatile organic hazardous air pollutants (VOHAP) content exceeding the applicable limit given in Table 1 of this permit.

The requirements of this condition do not apply to coatings used in volumes of less than 200 liters (52.8 gallons) per year, provided the total volume of coating exempt under this condition does not exceed 1,000 liters per year (264 gallons per year) at the facility. Coatings exempt under this condition shall be clearly labeled as "low-usage exempt," and the volume of each such coating applied shall be maintained in the facility's records.

B. Operating Requirements

1. High Volume Low Pressure (HVLV), or equivalent, spray guns shall be used for surface coating operations in the spray room.
2. All materials containing VOCs, VOHAPs and/or Listed Toxic Air Contaminants shall be stored in containers that are closed at all times except when material is being added or removed.

C. Recordkeeping and Reporting Requirements

1. The owner/operator shall compile records on a monthly basis and

maintain those records for a minimum of 5 years. At a minimum, these records shall include:

- a. The name, identification number and amount used of each coating, as applied;
 - b. The mass of VOC per volume (excluding water and exempt compounds), as applied, for each coating used;
 - c. Identification of the marine coatings used, their appropriate coating categories, and the applicable VOHAP limit;
 - d. The mass of VOHAP per volume (excluding water and exempt compounds), as applied, for each marine coating used; and,
 - e. The type and amount of solvent used for diluents and clean up operations.
2. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from all surface coating operations. 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 of determining that the total quantity of volatile organic compound emissions discharged to the atmosphere from all surface coating operations exceeds 1,666 pounds in any one calendar month.
 4. The owner/operator shall notify the Office of Air Resources, in writing, within 15 days of determining that the as applied VOHAP content of any marine coating used at the facility exceeds the VOHAP limit in Table 1 of this permit.

II. The following requirements are applicable to the abrasive blasting operations and associated AIREX dust collection system.

A. Emission limitations

1. Particulate matter generated from the abrasive blasting operations shall be captured, contained and routed to a dust collector for treatment. Particulate matter captured from the abrasive blasting operations shall be reduced by 99% or greater before discharge to the atmosphere.
2. Visible emissions from abrasive blasting operations shall not exceed 10% opacity (six-minute average).

B. Operating Requirements

1. The AIREX dust collection system shall be operated according to its design specifications whenever the equipment emitting air contaminants is in operation.
2. There shall be no bypassing of the air pollution control equipment at any time.

C. Monitoring Requirements

1. The pressure drop across the AIREX dust collection system shall be monitored whenever abrasive blasting operations are being performed.
2. The owner/operator shall, on a monthly basis, conduct visual inspections of each dust collection system's ductwork for leaks.
3. The owner/operator shall conduct inspections of the interior of each dust collector for structural integrity and to determine the condition of the dust collector every 12 months.

D. Recordkeeping

1. The owner/operator shall check the pressure drop across the AIREX dust collection system a minimum of once per day during each day of operation and the date, time and measurement shall be recorded.
2. The owner/operator shall maintain records of all inspection data. Such records shall include:
 - a. The date, place and time of the inspection;
 - b. Person conducting the inspection;
 - c. Technique or method used;
 - d. Operating conditions during the inspection;
 - e. Results of the inspection; and
 - f. Any maintenance action taken.

E. Malfunctions

1. 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 necessary to bring the air pollution control system back to operating at its design control efficiency 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. Any parts or material needed should be shipped overnight where possible or practical.
- 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 or otherwise approved by the Office of Air Resources, 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.

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.

III. The following requirements are applicable to operations on a facility-wide basis:

A. Emission Limitations

1. Volatile Organic Compound (VOC) Emission Limitations

The total quantity of VOC emissions discharged to the atmosphere from all operations conducted at the entire facility shall not exceed 20,000 pounds in any consecutive 12-month period.

2. Hazardous Air Pollutant (HAP) Emission Limitations

The total quantity of HAP emissions discharged to the atmosphere from all operations, from the entire facility, shall not exceed 1,500 pounds of any one HAP or 1667 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average. HAP shall mean an air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act Amendments of 1990.

3. Listed Toxic Air Contaminants Emission Limitations

The total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9, based upon a 12-month rolling average. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.

B. Recordkeeping and Reporting Requirements

1. The owner/operator shall maintain the following records on a monthly basis:

- a. The name, identification number and amount of each material containing VOC, HAP, and/or listed toxic air contaminant used at the facility; and,
- b. A Material Safety Data Sheet (MSDS) showing the VOC, HAP, and/or listed toxic air contaminant content of each material used at the facility.

2. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC emissions 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.

3. The owner/operator shall notify the Office of Air Resources, in writing, within 15 days of determining whenever the quantity of VOC discharged to the atmosphere exceeds 20,000 pounds in any consecutive 12-month period.
4. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of HAP emissions 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 of determining that the total quantity of HAP emissions discharged to the atmosphere from all operations for the entire facility exceeds 1,500 pounds of any one HAP or 1667 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 15 days after the first of the month, determine the total quantity of each listed toxic air contaminant in Appendix A of Air Pollution Control Regulation No. 9 discharged to the atmosphere from all operations for the entire facility. Monthly and 12-month rolling averages shall be calculated. The 12-month rolling average shall be used for comparison with emission limitations. 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 of determining that the total of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9.
8. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the equipment covered by this permit no later than fifteen days after such date.
9. 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.

10. 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.
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. 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.

C. Other Requirements

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, upon presentation of credentials and other documents as required by law, 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.

TABLE 1
VOHAP Limits for Marine Coatings

Coating Category	Grams VOC/liter coating (minus water and exempt compounds)
General use	340
Specialty:	
Air flask	340
Antenna	530
Antifoulant	400
Heat resistant	420
High-gloss	420
High-temperature	500
Inorganic zinc high-build	340
Military exterior	340
Mist	610
Navigational aids	550
Nonskid	340
Nuclear	420
Organic zinc	360
Pretreatment wash primer	780
Repair and maintenance of thermoplastics	550
Rubber camouflage	340
Sealant for thermal spray aluminum	610
Special marking	490
Specialty interior	340
Tack coat	610
Undersea weapons systems	340
Weld-through preconstruction primer	650