

29 May 2014

Mr. Paul Donndelinger
Engineering and EHS Manager
Cooley Group, Inc.
50 Esten Avenue
Pawtucket, Rhode Island 02860

Dear Mr. Donndelinger:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of an extruder plate bake oven to be located at your 50 Esten Avenue facility in Pawtucket, Rhode Island.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2251).

The issuance of this minor source permit qualifies as an Off-Permit Change for your Title V Operating Permit under subsection 29.11.2 of Air Pollution Control Regulation No. 29. This minor source permit will be incorporated into your operating permit at the time of renewal or re-opening.

A copy of this minor source permit and a copy of your application should be maintained with your operating permit at all times until this permit is incorporated into your operating permit. In addition, as stated in subsection 29.11.2(d) of Air Pollution Control Regulation No. 29, the permit shield in Section II of your operating permit shall not apply to this permit until it is incorporated into your operating permit.

If there are any questions concerning this permit, please contact me at 401-222-2808, extension 7415 or at stephen.stamand@dem.ri.gov.

Sincerely,

Stephen G. St. Amand
Air Quality Specialist
Office of Air Resources

cc: Pawtucket Building Official
Eric A. Pearson, P.E. and Senior Engineer - ESS Group, Inc.

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

MINOR SOURCE PERMIT

COOLEY GROUP, INC.

APPROVAL NO. 2251

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

Cooley Group, Inc.

For the following:

*Installation of a Pollution Control Products Model SP-13, 0.3 MMBTU/hr gas-fired extruder
plate bake oven, used to ash plastic resins from extruder plates.*

Located at: *50 Esten Avenue, Pawtucket, RI*

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 *Cooley Group, 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 L. 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

COOLEY GROUP, INC.

Approval No. 2251

A. Emission Limitations

1. Hydrochloric Acid (HCl)

The emissions of HCl from the entire facility shall not exceed 700 pounds per year in any consecutive 12-month period.

2. Opacity

Visible emissions from the plate bake oven exhaust flue shall not exceed 10% opacity (six-minute average). Where the presence of uncombined water is the only reason for failure to meet the requirements of this condition, such failure shall not be a violation of this permit.

3. Odors

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 quantity of extruder plates containing polyvinyl chloride (PVC) residual resin fired in the plate bake oven shall not exceed 1775 plates per year in any consecutive 12-month period. For purposes of this limitation, twelve (12) die adapter bolts containing PVC resin are considered equivalent to one (1) extruder plate containing PVC residual resin.

2. The owner/operator shall operate the plate bake oven in accordance with the manufacturer's operating procedures.

3. The secondary chamber shall be equipped with a temperature controller and indicator.

4. The thermocouple shall be located as close to the secondary chamber exit as possible.

5. The temperature controller shall be set to maintain secondary chamber temperature at 1400°F or greater.
6. The oven door shall remain closed whenever material is being processed.

C. Continuous Monitors

1. The secondary chamber temperature shall be monitored continuously. The temperature shall be checked once during each baking cycle and the date, time and measurement shall be recorded.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records whenever the bake oven is operated:
 - a. The total number of plates containing PVC resin and the total number of die adapter bolts containing PVC resin baked during each baking cycle;
 - b. The operating temperature measurement of the secondary chamber once during each baking cycle.
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 extruder plates containing PVC resin and total quantity of die adapter bolts containing PVC resin processed in the plate bake oven for the previous 12-month period. 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 combined quantity of extruder plates containing PVC resin and the total quantity of equivalent die adapter bolts containing PVC resin processed in the plate bake oven exceeds 1775 plates for the previous 12-month period.
4. The owner/operator shall, on a monthly basis, no later than 15 business days after the first of the month, determine the total quantity of HCl discharged to the atmosphere from the entire facility for the previous 12-month period. 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 HCl discharged to the atmosphere from the entire facility exceeds 700 pounds for the previous 12-month period.
6. Deviation from permit conditions, including those attributable to upset conditions as defined in this permit, shall be reported, in writing, within five (5) business days of the deviation, to the Office of Air Resources. A copy of any such report

shall be sent to the USEPA Region 1. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7. 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.
8. 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.

9. 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.

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 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 repairs were performed.
- e. Emissions during the period of time that the repairs were performed will not:
 - (1) Cause a 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.

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. The owner/operator shall shut down the bake oven in the event of a malfunction of the bake oven that results in, or that could result in, emissions in excess of the permit limits. The bake oven shall remain shut down until the malfunction has been identified and corrected

4. At all times, including periods of startup, shutdown and malfunctions, the owner/operator shall, to the extent practicable, maintain and operate the oven 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.