

22 April 2015

COL Arlene A. Mello  
Rhode Island Army National Guard  
645 New London Avenue  
Cranston, RI 02920

Dear COL Mello:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of process equipment located at Camp Fogarty Combined Training Site, within the Combined Support Maintenance Shop at 2841 South County Trail, East Greenwich, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2287).

If there are any questions concerning this permit, please contact me at 401-222-2808, extension 7177 or at [kassandra.mckenzie@dem.ri.gov](mailto:kassandra.mckenzie@dem.ri.gov).

Sincerely,

Kassandra McKenzie, EIT  
Air Quality Specialist  
Office of Air Resources

cc: East Greenwich Building Official  
Bradford Labine- RIARNG  
Lucas Wilbur- RIARNG

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

MINOR SOURCE PERMIT

*RHODE ISLAND ARMY NATIONAL GUARD*

APPROVAL NO. 2287

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

*Rhode Island Army National Guard*

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For the following:

*Installation of a Global Finishing Solutions LLC paint/bake spray booth, Model No. SDW-1816-PDT-56 with nine spray guns.*

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Located at: *Combined Support Maintenance Shop*

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*2841 South County Trail, East Greenwich, Rhode Island*

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**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 the Rhode Island Army National Guard 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.**

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Douglas L. McVay, Chief  
Office of Air Resources

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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 ARMY NATIONAL GUARD**

**APPROVAL NO. 2287**

**A. Emission Limitations**

1. Volatile Organic Compound (VOC) Emission Limitations

- a. The total quantity of VOC emissions discharged to the atmosphere from all surface coating operations shall not exceed 1,666 pounds in any one calendar month.
- b. If the emission limitation in A.1.a is exceeded, the emission limitations specified in Air Pollution Control Regulation 19, Subsection 19.3.1 shall immediately apply.

2. Hazardous Air Pollutant (HAP) Emission Limitations

The total quantity of HAP emissions discharged to the atmosphere from all operations shall not exceed 1,500 pounds of any one HAP or 4,000 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.

4. 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. High Volume Low Pressure (HVLP), or equivalent, spray guns shall be used for surface coating operations in the spray booth.
2. The spray booth shall be equipped, at all times, with overspray filter media that treats all exhausted air prior to discharge to the atmosphere.
3. A gauge shall be installed and maintained to indicate the static pressure differential across the overspray filter media.
4. All materials containing VOC shall be stored in containers that are closed at all times except when material is being added or removed.
5. The owner/operator shall operate the Paint/Bake Spray Booth in accordance with the manufacturer's operating procedures.
6. All spray guns must be cleaned in a device that meets the following specifications:
  - a. Solvent must be recirculated during the cleaning process so that the solvent is used until it no longer cleans guns satisfactorily; and
  - b. Spent solvent must be collected so it is available for disposal; and
  - c. The device must be vapor tight during cleaning, rinsing and draining operations.

## **C. Record Keeping and Reporting**

1. The owner/operator shall collect and record all of the following information each month:
  - a. The name, identification number and amount used of each coating, as applied; and,
  - b. The mass of VOC per volume (excluding water and exempt compounds), as applied, for each coating used; and,
  - c. The mass of HAP per volume of each coating used, as applied; and,
  - d. The type and amount of solvent used for diluents and cleanup 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 VOC emissions discharged to the atmosphere from all surface coating operations exceeds 1,666 pounds in any one calendar month.
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 surface coating operations. 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 4,000 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 the Air Pollution Control Regulation No. 9 discharged to the atmosphere from 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 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 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, 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.
  
11. 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 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 time 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 malfunctions, 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. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this permit have been achieved. 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. This permit contains emission limitations and recordkeeping and reporting requirements relating to Volatile Organic Compounds (VOCs). A VOC is defined in the Office of Air Resources' General Definitions Regulation. Any organic compound not excluded from the definition is considered a VOC under this permit.