

24 March 2016

Mr. Mark Newhart
VP, Logistics & Distribution
McInnis USA, Inc.
850 Canal Street, 3rd Floor
Stamford, CT 06902

Dear Mr. Newhart:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the construction and installation of air pollution control equipment at your Port of Providence cement distribution facility located in Providence, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 2316-2320).

This permit application did not include vendor specific information for each of the dust collectors. Prior to start-up of the cement distribution facility, McInnis USA, Incorporated shall submit to the Office of Air Resources, in writing, the specifications of each selected dust collector including information to show the device will achieve the 99.8% reduction requirement in Condition A.2. If the specifications differ from those in the permit application, a revision to the permit conditions and emission limitations of this permit may be necessary prior to installation of the equipment.

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: Providence Building Official
Shawn M. Martin, PE – Fuss & O’Neil, Inc.
Samuel Zammarrelli, III, PE – Fuss & O’Neil, Inc.

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

MINOR SOURCE PERMIT

*McINNIS USA, INC. –
PROVIDENCE CEMENT RECEIVING AND DISTRIBUTION TERMINAL*

APPROVAL NOS. 2316 - 2320

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

McInnis USA, Inc. – Providence Cement Receiving and Distribution Terminal

For the following:

The construction and installation of five (5) dust collectors to control particulate emissions generated from the unloading, storage and loading of Portland cement. Two, identical 23,000 scfm dust collectors (Approval Nos. 2316 & 2317) for ship unloading and front end loader operations in the warehouse. One-8750 scfm dust collector for loading from the reclaim hopper to storage tanks (Approval No. 2318). Two-2500 scfm dust collectors for transfer from the storage tanks to trucks (Approval No. 2319) and railcars (Approval No. 2320).

Located at: *Port of Providence (ProvPort), Providence, 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 *McInnis USA, Inc. – Providence Cement Receiving and Distribution Terminal* 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

**McINNIS USA, INC. –
PROVIDENCE CEMENT RECEIVING AND DISTRIBUTION TERMINAL**

APPROVAL NOs. 2316 - 2320

A. Emission Limitations

1. The emission rate of particulate matter discharged to the atmosphere from each dust collector stacks shall not exceed the following:
 - a. 0.73 lb/hr for each dust collector controlling particulate emissions from pneumatic loading from ship to warehouse compartment and from front-end loader operations moving material in warehouse;
 - b. 0.13 lb/hr for the dust collector controlling particulate emissions from pneumatic loading from the reclaim hopper to the loadout tanks;
 - c. 0.52 lb/hr for the dust collector controlling particulate emissions from the gravity transfer from the loadout tanks to trucks;
 - d. 0.52 lb/hr for the dust collector controlling particulate emissions from the gravity transfer from the loadout tanks to railcar;
2. Particulate emissions treated by each dust collector shall be reduced by 99.8% or greater before discharged to the atmosphere.
3. Visible emissions from each dust collector stack shall not exceed 10% opacity (six-minute average).

B. Operating Requirements

1. All particulate emissions generated from the following transfer operations shall be captured, contained, and routed to a dust collector servicing that transfer point for treatment prior to discharge to the atmosphere:
 - a. Pneumatic loading from ship to a warehouse compartment,
 - b. Front-end loader operations moving material in the warehouse,
 - c. Pneumatic loading from the reclaim hopper to the loadout tanks,
 - d. Gravity transfer from the loadout tanks to trucks, and

e. Gravity transfer from the loadout tanks to railcars.

2. All reasonable precautions shall be taken to prevent visible fugitive emissions from the facility.
3. All dust collectors shall be operated according to its design specifications whenever the equipment emitting air contaminants is in operation.

C. Continuous Monitoring

1. The pressure drop across each dust collector shall be monitored continuously. Pressure drop shall be checked a minimum of once per day, and the date, time, and measurement shall be recorded.
2. The owner/operator shall, on a monthly basis, conduct visual inspections of each dust collection system's ductwork for leaks. If leaks or abnormal conditions are detected, action to correct the abnormal condition shall be implemented before the dust collector is put back into service.
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 and Reporting

1. The owner/operator shall maintain records of the daily pressure drop measurement of each dust collector.
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.
3. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of each dust collector no later than fifteen days after such date.
4. 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.

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 permit 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 the 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 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, 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.
7. All records required as a condition of 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. 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. There shall be no bypassing of the air pollution control equipment at any time.
3. 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.
4. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate this equipment 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.

F. 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 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; 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.