

12 February 2015

Ms. Lisa Fortin  
Sprague Operating Resources, LLC  
144 Allens Avenue  
Providence, RI 02903

Dear Ms. Fortin:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for a Temporary Permit for a distillate oil fired boiler at your facility located at 144 Allens Avenue, Providence, RI.

Enclosed is a Temporary Permit issued pursuant to our review of your application (Temporary Permit No. TPFOB-11).

If there are any questions concerning these permits, please contact me at 401-222-2808, extension 7110 or at [ruth.gold@dem.ri.gov](mailto:ruth.gold@dem.ri.gov).

Sincerely,

Ruth A. Gold  
Supervising Air Quality Specialist  
Office of Air Resources

cc: Providence Building Official

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

TEMPORARY PERMIT FOR A BOILER

*SPRAGUE OPERATING RESOURCES, LLC*

TEMPORARY PERMIT NO. TPF0B-11

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

*Sprague Operating Resources, LLC*

---

For installation of the following boiler:

*Cleaver Brooks Model No. CBLE-200-350, 350 HP boiler, fired with distillate fuel oil containing 0.05 weight percent sulfur or less.*

---

---

---

Located at: *144 Allens Avenue, Providence*

---

---

This temporary permit shall be effective from the date of its issuance and shall remain in effect for 180 days. This temporary permit does not relieve *Sprague Operating Resources, LLC* 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

**SPRAGUE OPERATING RESOURCES, LLC**

**TEMPORARY PERMIT NO. TPF0B-11**

A. Emission Limitations

1. Sulfur Dioxide

All fuel oil burned in the boiler shall contain no more than 0.05 percent sulfur by weight.

2. Visible emissions from the boiler shall not exceed 10% opacity except for a period or periods aggregating no more than three minutes in any one-hour.

B. Operating Requirements

1. The maximum firing rate of the boiler shall not exceed 45 gal/hr of No. 2 fuel oil.

2. The owner/operator shall limit the quantity of No. 2 fuel oil combusted in the temporary boiler to 197,100 gallons.

3. The duration of operation of the temporary boiler shall not exceed 180 days.

4. The total heat input capacity of the existing fuel burning equipment that will be offline or removed from service during the operation of the temporary boiler shall be greater than or equal to 6.3 MMBtu/hr.

C. Continuous Monitors

1. Continuous emission monitoring equipment shall be installed, operated and maintained for opacity.

D. Fuel Oil Testing

1. Compliance with fuel oil sulfur limits may be determined based on a certification from the fuel supplier.

2. Fuel supplier certification shall include the following information:
    - a. The name of the oil supplier;
    - b. The sulfur content of the oil;
    - c. The location of the oil when the sample was drawn for analysis to determine the sulfur of the oil; specifically including whether the oil was sampled as delivered to Sprague Operating Resources, LLC or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility or another location;
    - d. The method used to determine the sulfur content of the oil.
  3. 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 oil in the initial tank of oil to be fired in the boiler and after each new shipment of oil is received. Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted.
  4. Each fuel supplier certification or each fuel oil analysis must demonstrate that the oil contains 0.05 percent sulfur by weight or less.
- E. Record Keeping and Reporting
1. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up no later than fifteen days after such date.
  2. The owner/operator shall measure and record monthly the quantity of fuel used in the boiler. 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 if its fuel usage for the temporary boiler exceeds 197,100 gallons of No. 2 fuel oil.
  4. The owner/operator shall notify the Office of Air Resources in writing of the date of removal of the temporary boiler no later than fifteen days after such date.
  5. The owner/operator shall notify the Office of Air Resources in writing if the duration of operation of the temporary boiler exceeds 180 days.
  6. The owner/operator shall retain copies of all fuel supplier certifications or fuel oil analysis for each calendar quarter. These records shall be made accessible for review by the Office of Air Resources or EPA. This quarterly record shall include a certified statement, signed by the

owner/operator, that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the quarter.

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. 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.
10. 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.

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, investigation 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 boiler 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.