

State of Rhode Island
Department of Environmental Management
Office of Air Resources

NOTICE OF PUBLIC COMMENT PERIOD

The Office of Air Resources offers an opportunity for public comment regarding its proposal to issue an Emissions Cap for the following stationary source:

VIBCO, Inc., 75 Stilson Road, Wyoming, RI

Emissions Cap No. 120-2018 for VIBCO, Inc. is being issued to address requirements for surface coating operations.

Air Pollution Control Regulation No. 29 - Operating Permits contains provisions to allow sources to apply for an emissions cap. An emissions cap must be federally enforceable and include some combination of production and/or operational limitations to ensure that emissions are limited by quantifiable and enforceable means. An emissions cap relieves the stationary source from the requirement to obtain an operating permit.

The public comment period for the emissions cap will begin today and continue until August 24, 2018. A public hearing for interested persons to appear and submit written or oral comments on the draft emissions caps will be held if requested by 10 or more persons, or by a governmental subdivision or agency or by an association having not less than 10 members. Any interested person may request that a public hearing be held.

Written comments, to be considered part of the record must be submitted during the public comment period. Written comments or requests for a hearing may be sent to the Office of Air Resources at the address below until 4:00 PM, August 24, 2018, at which time the public comment period will close.

The draft emissions cap is available for inspection at the Office of Air Resources, 235 Promenade Street, Providence RI from 8:30am to 4:00pm. For more information, contact Richard Younkin or David DelSesto at (401) 222-2808 (toll free 1-800-752-8088, TTY 711).

Signed this 20th day of July 2018



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

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

VIBCO, INC.

DRAFT EMISSIONS CAP NO. 120-20XX

Pursuant to the provisions of Air Pollution Control Regulation No. 29, this emissions cap is issued to:

VIBCO, INC.

Located at: *75 Stilson Road, Wyoming, RI*

This emissions cap shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department.

This emissions cap does not relieve VIBCO, INC. from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this facility shall be subject to the attached operating requirements and conditions and in accordance with the representation of the facility in the emission cap application form(s) submitted.

This emission cap shall be considered an enforceable document as the term is used in Rhode Island's Air Pollution Control Regulations.

Date of Issuance: _____

**Laurie Grandchamp, P.E., Chief
Office of Air Resources**

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

Conditions and Emission Limitations

VIBCO, INC.

DRAFT Emissions Cap No. 120-2018

A. Emission Limitations

1. Volatile Organic Compounds (VOC)

- a. The total quantity of VOC emissions discharged to the atmosphere from all surface coating operations at the facility shall not exceed 1,666 pounds in any one calendar month. Surface coating as it pertains to this permit is defined in 250-RICR-120-05-19, subpart 19.5(A)(20).
- b. If the emission limitation in Condition A.1.a of this permit is exceeded, the emission limitations specified in § 19.7(A) shall immediately apply.
- c. The total quantity of VOC emissions discharged to the atmosphere from the entire facility shall not exceed 48,000 pounds in any consecutive 12-month period.

2. Hazardous Air Pollutant (HAP)

The total quantity of HAP emissions discharged to the atmosphere from all operations, from the entire facility, shall not exceed 750 pounds of any one HAP or 2000 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.

B. Recordkeeping and Reporting

1. The owner/operator shall keep and maintain records sufficient to determine actual VOC and HAP emissions from the entire facility for the previous 12 months. Actual VOC emissions and HAP emissions shall be determined on a monthly basis, no later than 15 days after the first of the month. This provision shall become effective immediately upon issuance of the emissions cap. All purchase orders, invoices, including those records listed below and other documents to support the determination of actual VOC emissions and HAP emissions shall be maintained and be made available to the Office of Air Resources upon request.
2. The owner/operator shall notify the Office of Air Resources in writing, within 30 days, whenever the total quantity of VOCs discharged to the atmosphere from all surface coating operations exceeds 1,666 pounds in any calendar month.

3. The owner/operator shall notify the Office of Air Resource in writing, within 30 days, whenever the total quantity of VOCs emissions discharged to the atmosphere from all operations exceeds 48,000 pounds in any consecutive 12-month period.
4. The owner/operator shall notify the Office of Air Resources in writing, within 30 days, whenever the total quantity of HAP emissions discharged to the atmosphere from all operations for the entire facility exceeds 750 pounds of any one HAP or 2000 pounds of any combination of HAPs per calendar month, based upon a 12-month rolling average.
5. The owner/operator shall collect and record all of the following information each month. This information shall be made available to the Office of Air Resources upon request:
 - a. The name, identification number and amount used each month of each coating, as applied, on each coating line or operation;
 - b. The mass of VOC per volume (excluding water and exempt compounds), as applied, for each coating used;
 - c. The mass of HAP per volume of each coating used, as applied; and,
 - d. The type and amount of solvent used as thinners and in cleaning operations each month at the facility.
6. 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 emissions cap 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 emissions cap.
 - 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 in the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulations and have the prior approval of the Director.

7. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this emission cap or any other applicable air pollution control rules and regulations.
8. All records required in this emission cap shall be maintained for a minimum of five years after the date of each record and shall be made available to the Office of Air Resources or its representative upon request.

C. Other Conditions

1. 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.
2. The Office of Air Resources may reopen and revise this emission cap if it determines that:
 - a. A material mistake was made in establishing the operating restrictions; or,
 - b. Inaccurate emission factors were used in establishing the operating restrictions; or,
 - c. The emissions cap must be revised to ensure that emissions from this facility do not exceed any of the applicability thresholds in Air Pollution Control Regulation No. 29.