

27 June 2003

Mr. Richard A. Costa
New England Container Co.
455 George Washington Highway
Smithfield, RI 02917-1996

Dear Mr. Costa:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of air pollution control equipment at your 455 George Washington Highway, Smithfield facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1052-1053, 1255 and 1757).

Should you have any questions concerning this permit, I can be reached at 401-222-2808, extension 7011.

Very truly yours,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Smithfield Building Inspector

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

MINOR SOURCE PERMIT

NEW ENGLAND CONTAINER COMPANY

APPROVAL NOs. 1052-1053, 1255 and 1757

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

New England Container Company

For the following:

Installation of an United Process Control pulse jet dust collector (Approval No. 1757). This installation is to replace the existing Amerex pulse jet dust collector (C003).

Located at: *455 George Washington Highway, Smithfield*

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 *New England Container Company* 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.

Stephen Majkut, 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

NEW ENGLAND CONTAINER COMPANY

APPROVAL NOS. 1052-1053, 1255 & 1757

A. Emission Limitations

1. Particulates

- a. The concentration of particulate matter discharged to the atmosphere shall not exceed 0.06 grains per dry standard cubic foot (gr/dscf) corrected to 12 percent CO₂.
- b. The emission rate of particulate matter discharged to the atmosphere shall not exceed 1.82 lbs. per hour.

2. Volatile Organic Compounds

- a. The emission rate of volatile organic compounds discharged to the atmosphere shall exceed 0.3 lbs per hour.

3. Hydrogen Chloride (HCL)

- a. The emission rate of HCL discharged to the atmosphere shall not exceed 1.30 lbs per hour.

4. Metals

The emission rate of each of the metals listed below shall never exceed the indicated allowable rate.

Arsenic	0.0022 lbs/hr
Cadmium	0.0067 lbs/hr
Chromium VI	0.0010 lbs/hr
Lead	1.2 lbs/hr
Manganese	0.52 lbs/hr
Nickel	0.022 lbs/hr

5. Visible emissions from either exhaust stack shall not exceed 10 percent opacity.

B. Operating Requirements

1. The afterburner temperature shall be maintained at or above 1800°F at all times that the furnace is operating.
2. The drum reconditioning furnace line speed shall not exceed 14 feet per minute.
3. The quantity of drums processed shall not exceed 300 per hour.
4. Inlet temperature to the dust collector shall not exceed 350°F.
5. The waste heat boiler shall burn natural gas only and the maximum heat input to the burner shall not exceed 8.652 MMBTU/hr.
6. There shall be no bypassing of the air pollution control equipment at any time that the furnace is processing drums.

C. Continuous Monitoring

1. The owner/operator shall install, operate, and maintain equipment to continuously monitor and record the operating temperature of the afterburner.
2. The thermocouple used to monitor the operating temperature of the afterburner shall be located as close to the exit of the afterburner as is possible.
3. The owner/operator shall install, operate, and maintain equipment to continuously monitor and record the inlet temperature to the dust collector.
4. Pressure drop across the dust collector shall be monitored continuously.

D. 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 of the dust collector no later than fifteen days after such date.
2. The pressure drop across the fabric filter shall be checked a minimum of once per shift and the date, time and measurement shall be recorded.
3. 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.

4. The owner/operator shall maintain daily records of sodium bicarbonate usage in the acid gas absorber.
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 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.

6. Deviations 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. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. Each report must be certified by a responsible official consistent with Condition II.X.4. of the facility's operating permit.
7. All records required as a condition of this approval must be made available to the Office of Air Resources or its representative upon request. These records must be maintained for a minimum of five years after the date of each record.

E. 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. All air pollution control systems shall be operated and maintained according to their design specifications and in a manner consistent with good air pollution control practices for minimizing emissions.

F. Malfunctions

1. Malfunction means a sudden and unavoidable breakdown of process or control equipment. In the case of a malfunction of any air pollution control system, all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of an air pollution control system is expected or may reasonably be expected to continue for longer than 24 hours and if the owner or operator wishes to operate the source on which it is installed at any time beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following:
 - a. Identification of the specific air pollution control system and source on which it is installed;
 - b. The expected period of time that the air pollution control system will be malfunctioning or out of service;
 - c. The nature and quantity of air contaminants likely to be emitted during said period;
 - d. Measures that will be taken to minimize the length of said period;
 - e. The reasons that it would be impossible or impractical to cease the source operation during said period.
2. 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 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.