

21 July 2004

Mr. John J. Keating, President  
P.J. Keating Company  
875 Phenix Avenue  
Cranston, RI 02921

Dear Mr. Keating:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the use of alternative fuel in your batch mix plant at your 875 Phenix Avenue, Cranston facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1807).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7011.

Sincerely,

Douglas L. McVay  
Associate Supervising Engineer  
Office of Air Resources

cc: Dennis Roy, ETG

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

**MINOR SOURCE PERMIT**

P.J. KEATING COMPANY

**APPROVAL NO. 1807**

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

*P.J. Keating Company*

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**For the following:**

*Permission to burn alternative fuel in the Madsen Batch Mix Plant.*

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**Located at:** *875 Phenix Avenue, Cranston*

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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 *P.J. Keating 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.**

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**Stephen Majkut, 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

**P.J. KEATING COMPANY**

**APPROVAL NO. 1807**

The following permit conditions and emission limitations are applicable to the Madsen Batch Mix Plant while burning alternative fuel.

A. Emission Limitations

1. Particulate Matter

- a. The concentration of particulate matter discharged to the atmosphere from the baghouse stack shall not exceed 0.04 grain per dry standard cubic foot.
- b. The emission rate of particulate matter discharged to the atmosphere from the baghouse stack shall not exceed 4.5 pounds per hour.

2. Opacity

Visible emissions from the baghouse stack shall not exceed 10 percent opacity (six-minute average).

3. Nitrogen Oxides (NO<sub>x</sub>)

- a. The concentration of nitrogen oxides discharged from the dryer shall not exceed 200 ppmv, corrected to 7 percent O<sub>2</sub> (1-hour average).
- b. The emission rate of nitrogen oxides discharged from the dryer shall not exceed 16.9 lbs per hour.

4. Carbon Monoxide (CO)

- a. The concentration of carbon monoxide discharged from the dryer shall not exceed 500 ppmv, corrected to 7 percent O<sub>2</sub> (1-hour average).
- b. The emission rate of carbon monoxide discharged from the dryer shall not exceed 25.7 lbs per hour.

5. Sulfur Dioxide (SO<sub>2</sub>)

All alternative fuel burned in the batch mix plant dryer shall contain no more than 0.5% sulfur by weight.

6. Listed Toxic Air Contaminants

The total quantity of any listed toxic air contaminant discharged to the atmosphere from the baghouse stack shall not exceed the limitations shown in Table 1. The limitations shown in pounds per year are calculated on a 12-month rolling basis. These limitations were established to ensure that emissions from this facility do not exceed any of the acceptable ambient levels (AALs) listed in Air Pollution Control Regulation No. 22.

B. Operating Requirements

1. The production rate of the batch mix plant shall not exceed 180 tons per hour.
2. The quantity of asphalt produced from the batch mix plant shall be limited to 225,000 tons or less for any consecutive 12-month period.
3. Alternative fuel shall only be burned in the rotary dryer.
4. The owner/operator shall have a full-time operator in attendance that is knowledgeable in the operation of the fuel burning equipment used for burning the alternative fuel.
5. Particulate emissions generated from the dryer shall be captured, contained, and routed to the baghouse for treatment prior to discharge to the atmosphere.
6. All reasonable precautions shall be taken to prevent visible, fugitive emissions from any of the equipment.

C. Continuous Monitors

1. The pressure drop across the baghouse shall be monitored continuously. Pressure drop shall be checked a minimum of once per day, and the date, time, and measurement shall be recorded.

D. Alternative Fuel Standards and Testing

1. Each delivery of alternative fuel to the facility must be accompanied by a certification from the supplier that indicates the alternative fuel meets the following standards:
  - a. Heating Value: 8,000 BTU/lb or greater

- b. Halogens: 1000 ppm by weight or less
  - c. Lead: 100 ppm by weight or less
  - d. Sulfur: 0.5% by weight or less
  - e. PCB: 50 ppm by weight or less
  - f. Flashpoint: 100°F minimum
  - g. Arsenic: 5 ppm by weight or less
  - h. Cadmium: 2 ppm by weight or less
  - i. Chromium: 10 ppm by weight or less
2. The alternative fuel certification shall also include analytical results for chromium (hexavalent), manganese, nickel, viscosity, bottom solids and water and ash content.
  3. All analyses performed for the requirements of this section shall be according to those methods specified in Appendix A of Air Pollution Control Regulation No. 20, "Burning of Alternative Fuels". Alternative methods may be used providing they have the prior approval of the Office of Air Resources.

E. Emission Testing

1. The owner/operator shall conduct emission testing of the equipment to demonstrate compliance with the emission limitations for particulate matter, nitrogen oxides and carbon monoxide while burning alternative fuel only. Testing shall be conducted within 180 days after initial firing of alternative fuel.
2. An emission testing protocol shall be submitted to the Office of Air Resources for review and approval prior to the performance of any compliance tests. The owner/operator shall provide the Office of Air Resources at least 60 days prior notice of any compliance test.
3. Emission testing shall be performed in accordance with procedures specified in 40 CFR 60, Appendix A, unless other test methods are prescribed by RIDEM.
4. The owner/operator shall install any and all test ports or platforms necessary to conduct the required testing, provide safe access to any platforms and provide the necessary utilities for sampling and testing equipment.

5. All testing shall be conducted under operating conditions deemed acceptable and representative for the purpose of assessing compliance with the applicable emission limitations.
  6. A final report of the results of any compliance testing shall be submitted to the Office of Air Resources no later than 60 days following completion of testing.
- F. Record Keeping and Reporting
1. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the quantity of asphalt produced from the batch mix plant for the previous 12 months. The owner/operator shall keep records of this determination and provide such records 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 quantity of asphalt produced from the batch mix plant, for any 12-month period, exceeds 225,000 tons.
  3. The owner/operator shall maintain records of the quantity and types of fuel used in the rotary dryer.
  4. The owner/operator shall maintain records of the daily pressure drop measurement of the baghouse.
  5. The owner/operator shall maintain the following records:
    - a. The feed rate of the alternative fuel;
    - b. The total fuel oil feed rate;
    - c. The date and hour deliveries or additions to the fuel storage tanks are made and the quantity;
    - d. The time that burning of the alternative fuel commenced and ceased, or was interrupted, including the date and hour;
    - e. The name and address of the supplier of the alternative fuel.
  6. The owner/operator shall submit each alternative fuel certification to the Office of Air Resources within ten (10) days of each delivery.
  7. The owner/operator shall retain copies of all alternative fuel supplier certifications for each alternative fuel delivery. These records shall be made accessible for review by the Office of Air Resources or EPA.

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 in this permit shall be maintained for a minimum of five (5) years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

G. 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 dated 20 January 2004, prepared by Engineering Technologies Group, Inc..
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. There shall be no bypassing of the air pollution control equipment at any time.
4. A Visolite or similar leak detection test shall be conducted prior to the initial startup and operation, when plant operations are resumed after winter shutdown and every 90 days during the operating season.
5. At all times, including periods of startup, shutdown and malfunction, 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. 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.

H. Malfunctions

1. A malfunction of any air pollution control system that would result in the exceedance of any emission limitation applicable to this facility will necessitate the shutdown of the facility. The facility must remain shutdown until the malfunction has been identified and corrected.
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.

Table 1. Emissions Limitations for Listed Toxic Air Contaminants

Pollutant	Limitation		
	pounds/hour	pounds/day	pounds/year
Acetaldehyde	--	--	9125
Arsenic & compounds	0.034	--	3.65
Benzene	33.67	302.5	1825
Cadmium & compounds	--	1.0	10.95
Chromium VI & compounds	--	10.08	1.46
Formaldehyde	8.42	403.4	1460
Hydrogen chloride	336.7		18,000 <sup>1</sup>
Lead	--	--	146
Manganese & compounds	--	0.50	730
Nickel & compounds	1.01	--	73
Polycyclic Organic Matter	--	--	1.64

<sup>1</sup>Set to ensure allowable emissions do not exceed the major source threshold for Hazardous Air Pollutants