

5 June 2012

Mr. Bruce C. Ferguson
Ferguson Perforating & Wire Co., Inc.
130 Ernest Street
Providence, RI 02905

Dear Mr. Ferguson:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of air pollution control equipment and process equipment at your 130 Ernest Street, Providence facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 2169 & 2170).

If there are any questions concerning this permit, please contact me at 401-222-2808, extension 7110.

Sincerely,

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

cc: Providence Building Official
Bob Kenyon, Greencorp

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

MINOR SOURCE PERMIT

FERGUSON PERFORATING & WIRE CO., INC.

APPROVAL NOs. 2169 & 2170

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

Ferguson Perforating & Wire Co., Inc.

For the following:

Installation of a Cincinnati Incorporated Laser Cutting System, Model No. CL-940 (Approval No. 2169) and a Donaldson/Torit Powercore Dust Collector, Model No. TG12 with an intergrated Ultra-Lok HEPA filter (Approval No. 2170).

Located at: *130 Ernest Street, Providence*

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 *Ferguson Perforating & Wire Co., Inc.* 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, Acting 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

FERGUSON PERFORATING & WIRE CO., INC.

APPROVAL NOS. 2169 & 2170

A. Emission Limitations

1. All particulate matter generated from the laser cutting system shall be captured, contained, and routed first to the dust collector followed by the HEPA filter for treatment prior to discharge to the atmosphere. Particulate matter from the laser cutting system shall be reduced by 99.97% or greater before discharge to the atmosphere.
2. Listed Toxic Air Contaminants Emission Limitations

The total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant, shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9, based upon a 12-month rolling average. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.
3. Visible emissions from the exhaust shall not exceed 10% opacity (six-minute average).

B. Monitoring Requirements

1. The pressure drop across the dust collector and the HEPA filter shall be monitored continuously and checked a minimum of once per day, and the date, time and measurement shall be recorded. This daily recordkeeping is not required if the dust collector is equipped with an electronic interlock system that automatically shuts down the ventilation system leading to the Torit dust collector in the event the pressure drop across the system is outside the manufacturer's recommended operating range.
2. The owner/operator shall, on a weekly basis, conduct visual inspections of the dust collector ductwork for leaks.
3. The owner/operator shall conduct inspections of the interior of the dust collector for structural integrity and to determine the condition of the filter packs every 12 months.

C. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records:
 - a. The type, gauge and linear length of each metal processed by the laser cutter on a monthly basis;
 - b. The weight percent of any listed air contaminant in Appendix A of Air Pollution Control Regulation No. 9 contained in each metal processed by the laser cutter;
 - c. The total quantity of any listed air contaminant in Appendix A of Air Pollution Control Regulation No. 9 emitted from the entire facility;
 - d. The daily pressure drop measurement of the dust collector and the HEPA filter.
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.
4. The owner/operator shall, on a monthly basis, no later than 10 days after the first of the month, determine the total quantity of each listed toxic air contaminant in Appendix A of Air Pollution Control Regulation No. 9 discharged to the atmosphere from the entire facility. Monthly and 12-month rolling averages shall be calculated. The 12-month rolling average shall be used for comparison with emission limitations. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
5. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant, exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9.

6. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the dust collector system and laser cutting system no later than fifteen days after such date.
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:
 - Change the representation of the facility in the application.
 - Alter the applicability of any state or federal air pollution rules or regulations.
 - Result in the violation of any terms or conditions of this permit.
 - Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- a. Information describing the nature of the change.
- b. Information describing the effect of the change on the emission of any air contaminant.
- c. 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.

7. 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.
8. 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

D. 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 permittee 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.
5. The filter packs used in the dust collector shall be Torit-Built® PowerCore filters or its equivalent in terms of filtration efficiency.

E. 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 process discharging to the dust collectors. The process 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.