

1 July 2013

Mr. Matthew Fischer
Engineering Manager
Gannon & Scott, Inc.
33 Kenney Drive
Cranston, RI 02920

Dear Mr. Fischer:

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 45 Sharpe Drive, Cranston, Rhode Island facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2214).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7028.

Sincerely,

Aleida M. Whitney
Senior Air Quality Specialist
Office of Air Resources

cc: Cranston Building Official

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

MINOR SOURCE PERMIT

GANNON & SCOTT, INC.

APPROVAL NO. 2214

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

Gannon & Scott, Inc.

For the following:

*Installation of a U.S. Air Filtration, Inc. dust collector, Model 4DCP-48-26-13.8 to control
particulate emissions from milling, screening and blending precious metal bearing materials
during precious metal reclamation operations.*

Located at: *45 Sharpe Drive, Cranston, RI (Sweeps Room)*

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 *Gannon & Scott, 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, 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

GANNON & SCOTT, INC.

APPROVAL NO. 2214

A. Emission Limitations

1. Particulate matter generated from the milling, screening and blending processes shall be captured, contained, and routed to the dust collector for treatment. Particulate matter from each process shall be reduced by 99.97% or greater before discharge to the atmosphere.
2. Visible emissions from the exhaust vent of the dust collector shall not exceed 10% opacity (six-minute average).

B. Monitoring Requirements

1. The pressure drop across the dust collector shall be monitored continuously and checked a minimum of once per day and the date, time and measurement shall be recorded.
2. The owner/operator shall, on a weekly basis, conduct visual inspections of the dust collection system's ductwork for leaks.
3. The owner/operator shall conduct inspections of the interior of the dust collector for structural integrity every 12 months.
4. The owner/operator shall inspect and change out the U.S. Air Filtration, Inc. Nanofiber cartridge filters according to manufacturer specifications.

C. Initial Testing

1. The owner/operator shall collect and analyze a grab sample of particulate matter from the dust collector once every three months during the first 12 months of operation following issuance of this permit. Each sample shall be analyzed for the following metals: antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, manganese, mercury, molybdenum, nickel, selenium, vanadium, and zinc.
2. A final report of the analytical results shall be submitted to the Office of Air Resources no later than 60 days following the completion of the sampling period.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the daily pressure drop measurements of the dust collector and the date and amount of dust collected each time a drum is emptied.
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.
3. 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.
4. 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.
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:
 - 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.

6. 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.
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 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 received 21 November 2012.
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 cartridges used in the dust collector shall be the U.S. Air Filtration, Inc. Nanofiber cartridge filters or its equivalent in terms of filtration efficiency.

F. 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 collector. 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 was 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.