

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 a revised Emissions Cap(s) for the following stationary source(s):

**Kenney Manufacturing Company, 1000 Jefferson Blvd., Warwick, RI 02886**

Emissions Cap No. 27-2018 for Kenney Manufacturing Company is being revised to be consistent with the updated language and formatting in Rhode Island Regulation “Control of Volatile Organic Compounds from Surface Coating Operations”, 250-RICR-120-05-19. Emissions Cap No. 27-2018 was issued on April 3, 2018.

**Symmetry International, Inc., 55 Industrial Circle, Lincoln, RI 02865**

Emissions Cap No. 56-2018 for Symmetry International, Inc. is being revised to reflect the change of address for the facility and to be consistent with the updated language and formatting in Rhode Island Regulation “Control of Volatile Organic Compounds from Surface Coating Operations”, 250-RICR-120-05-19. Emissions Cap No. 56-2018 was last revised on January 23, 2018.

“Operating Permits”, 250-RICR-120-05-29 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 caps will begin today and continue until 04 March 2022. A virtual public hearing for interested persons 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, 04 March 2022, 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. Please contact the Office of Customer & Technical Assistance to schedule a file review at (401) 222-4700 Ext. 2777265, or email Brianna Seltzer at [Brianna.Seltzer@dem.ri.gov](mailto:Brianna.Seltzer@dem.ri.gov) to request the documents electronically. For more information, contact either Aleida Whitney or Brianna Seltzer at (401) 222-2808 (toll free 1-800-752-8088, TTY 711).

Signed this 27<sup>th</sup> day of January 2022.

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



**STATE OF RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

**EMISSIONS CAP PERMIT**

**KENNEY MANUFACTURING COMPANY**

**EMISSIONS CAP NO. 27-2022**

Pursuant to the provisions of “**Operating Permits**” 250-RICR-120-05-29, this emissions cap permit is issued to:

Kenney Manufacturing Company  
1000 Jefferson Blvd  
Warwick, RI 02886

This emissions cap permit 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 permit does not relieve *Kenney Manufacturing Company* 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.

This emission cap shall be considered an enforceable document as the term is used in “General Definitions Regulation” 250-RICR-120-0(A)(17).

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**Laurie Grandchamp, P.E., Chief  
Office of Air Resources  
Date of reissuance: xx/xx/2022**

**STATE OF RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

Operating Requirements and Conditions

**KENNEY MANUFACTURING COMPANY**

Emissions Cap No. 27-2022  
(Revised January 2022)

A. Emission Limitations

1. Volatile Organic Compounds (VOC)

- a. The total quantity of Volatile Organic Compounds (VOC) discharged to the atmosphere from all surface coating operations at the facility shall not exceed 1,666 pounds in any one calendar month.
- b. If the emission limitation in A.1.a. is exceeded, the emission limitations specified in "Control of Volatile Organic Compounds from Surface Coating Operations" 250-RICR-120-05-19.7.7 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)

- a. The total quantity of HAP emissions discharged to the atmosphere from all operations, from the entire facility, shall not exceed 1,500 pounds of any one (1) HAP or 4,000 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 Requirements

1. The owner/operator shall collect and maintain records sufficient to determine actual VOC and HAP emissions from the entire facility for the previous 12-months. Actual VOC and HAP emissions shall be determined on a monthly basis, no later than 15 days after the first of the month. All purchase orders, invoices and other documents to support the determination of actual VOC and HAP emissions shall be maintained and made available to the Office of Air Resources upon request.

2. The owner/operator shall collect and maintain records of the following information each month. The 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), as applied, for each coating used on each coating line or operation;
  - c. The mass of HAP per volume of each coating used on each coating line or operation, as applied;
  - d. The type and amount of solvent used as diluents and in cleanup operations; and
  - e. A Safety Data Sheet, a Certified Product Data Sheet or equivalent for each coating, diluent or cleaning solvent used.
3. 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.

#### C. Reporting Requirements

1. The owner/operator shall notify the Office in writing, within thirty (30) days, whenever the total quantity of HAP emissions discharged to the atmosphere from all operations for the entire facility exceeds 1,500 pounds of any one HAP or 4,000 pounds of any combination of HAPs per calendar month, based upon a 12-month rolling average.
2. The owner/operator shall notify the Office of Air Resources in writing within thirty (30) days, whenever the total quantity of VOCs discharged to the atmosphere from all surface coating operations exceeds 1,666 pounds in any month.
3. The owner/operator shall notify the Office in writing, within thirty (30) days, whenever the total quantity of VOCs emissions discharged to the atmosphere from all operations for the entire facility exceeds 48,000 pounds in any consecutive 12-month period.
4. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational changes 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. Results in the violation of any terms of conditions of the emission cap.
  - d. Qualify as a modification under "Air Pollution Control Permits", 250-RICR-120-05-09.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change in the emissions 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.

5. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this emissions cap or any other applicable air pollution control rules and regulations.

D. Other Conditions

1. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all reasonable times for the purpose of inspecting any air pollution sources, investigating 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 the 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 250-RICR-120-05-19 and 250-RICR-120-05-29.



**STATE OF RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

**EMISSIONS CAP PERMIT**

**SYMMETRY INTERNATIONAL, INC.**

**EMISSIONS CAP NO. 56-2022**

**Pursuant to the provisions of "Operating Permits" 250-RICR-120-05-29, this emissions cap is issued to:**

**Symmetry International, Inc.  
55 Industrial Circle  
Lincoln, RI 02865**

This emissions cap permit 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 permit does not relieve *Symmetry International, 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.

This emission cap shall be considered an enforceable document as the term is used in "General Definitions Regulation" 250-RICR-120-0(A)(17).

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**Laurie Grandchamp, P.E., Chief  
Office of Air Resources  
Date of reissuance: xx/xx/2022**

**STATE OF RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

Operating Requirements and Conditions

**SYMMETRY INTERNATIONAL, INC.**

Emissions Cap No. 56-2022  
(Revised January 2022)

**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.
- b. If the emission limitation in A.1.a is exceeded, the emission limitations specified in “Control of Volatile Organic Compounds from Surface Coating Operations”, 250-RICR-120-05-19.7.7(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 (1) 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 Requirements**

1. The owner/operator shall collect 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. 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 collect and maintain records 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), as applied, for each coating used on each coating line or operation;

- c. The mass of HAP per volume of each coating used on each coating line or operation, as applied;
  - d. The type and amount of solvent used for diluents and cleanup operations.
  - e. A Safety Data Sheet, a Certified Product Data Sheet or equivalent for each coating, diluent, or cleaning solvent used.
3. 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. Reporting Requirements**

1. 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.
2. The owner/operator shall notify the Office of Air Resource in writing, within 30 days, whenever the total quantity of VOC emissions discharged to the atmosphere from all operations for the entire facility exceeds 48,000 pounds in any consecutive 12-month period.
3. 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.
4. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this emissions cap 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:
  - 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 "Air Pollution Control Permits", 250-RICR-120-05-9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change in the emissions 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.

**D. Other Permit 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, investigating 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 250-RICR-120-05-19 and 250-RICR-120-05-29.