

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 Davis Street
Providence, R.I. 02908

6 May 1987

MAY 1.4 1987

Mr. Michael Deland Regional Administrator U.S. Environmental Protection Agency John F. Kennedy Federal Building Boston, MA 02203

Dear Mr. Deland:

The Department of Environmental Management (DEM) is hereby submitting for EPA approval a Consent Agreement between DEM and Tech Industries, Inc., 85 Fairmount Street, Woonsocket, Rhode Island as a single source revision to the Rhode Island State Implementation Plan. A public hearing was held to accept comments on the Consent Agreement on 17 February 1987 at 10:00 a.m. in Providence. A Notice of Hearing was published in the Providence Journal and Evening Bulletin and mailed to interested parties (see atachment 2) on 16 January 1987.

The Consent Agreement will require Tech Industries to control the emission of volatile organic compounds by applying reasonably available control technology. When RACT is fully implemented, emissions will have been reduced from about 240 tons of VOC per year to about 80 tons per year.

This submittal also satisfies milestone 3 of the SIP development output of our FY87 Section 105 Grant.

Chapter 23-23 of the General Laws of Rhode Island gives DEM the authority to enter consent agreements.

The following attachments are offered as suppport for this SIP revision:

Attachment 1 Affidavit of publication

Attachment 2 Notice of Hearing and mailing list

Attachment 3 Transcript of hearing

Attachment 4 Letters of comment (Audubon Society of RI, Adler

Pollack and Sheehan, and U.S. EPA)

Mr. Michael Deland Page 2 6 May 1987

Attachment 5

Consent Agreement File No. 86-12-AP

Attachment 6

Hearing Officer's decision

Attachment 7

Reasonable Available Control Technology for surface

201

coating of miscellaneous parts

I would appreciate your review and approval of this SIP revision. If you have any questions, please contact Stephen Majkut of my staff.

Very truly pours

Thomas D. Getz, Chief

Division of Air and Hazardous Materials

TDG:SM:CAP

Enclosures

cc: Louis Gitto

dlnd-sm/CP:2

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 Davis Street Providence, R.I. 02908

15 October 1987

Mr. Louis F. Gitto, Director Air Management Division US Environmental Protection Agency JFK Federal Building, Room 2311 Boston, MA 02203

Dear Mr. Gitto:

I am submitting this letter to request parallel-processing of this SIP revision for Tech Industries in Woonsocket, Rhode Island. Prior to final rulemaking by EPA, the DEM recognizes that the language allowing for compliance on a "facility-wide" or "daily basis" must not be included in this Consent Agreement (No. 86-12-AP). The DEM will amend the Consent Agreement to exclude this language in Provisions 5, 6H, and 6I. Further, Provisions 7 and 8 are not included as part of this SIP submittal.

In order to subsequently be able to bubble to meet the RACT emission limit specified in this Consent Agreement, Tech would have to apply for and be granted a bubble approval under Regulation No. 15, subsection 15.4 of the Rhode Island SIP.

Very trily yours,

Stephen Majkut, Supervising Principal Engineer

Division of Air and Hazardous Materials

SM: CP

cc: Robert C. Judge

gitto-sm/CP:6

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DEPARTMENT OF ENVIRONMENTAL MANAGEMENT 75 Davis Street Providence, R.I. 02908

4 January 1988

JAN 1 9 1988

Mr. Louis Gitto, Director Air Management Division U.S. Environmental Protection Agency John F. Kennedy Federal Building Boston, MA 02203

Dear Mr. Gitto:

Enclosed is a final copy of the addendum to the Consent Agreement between the Rhode Island Division of Air and Hazardous Materials and Tech Industries, Inc. This completes the SIP Revision Package which was received by EPA on 19 October 1987.

The division is proceeding to review Tech's request for compliance through emissions offsets and expects to issue public notice shortly. Per the 4 December 1986 Emissions Trading Policys, the division will submit a copy of the draft approval document on the first day of the comment period.

Please contact Christopher James of my staff should you have any questions.

Very truly yours,

Thomas D. Getz, Chief

Division of Air & Hazardous Materials

TDG/111

Enclosure

gitto-tg/Ll