



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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Commissioner

September 27, 2012

Mr. Michael Kramer
VP of Golf Ball Manufacturing and Operations
Acushnet Company
P.O. Box 965
Fairhaven, Massachusetts 02719

RE: NEW BEDFORD
Transmittal No.: X252144
Application No.: SE-12-040
Class: SM79-7
FMF No.: 38027
**AIR QUALITY PLAN
APPROVAL**

Dear Mr. Kramer:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Waste Prevention, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the proposed alteration of existing custom golf ball printing operations, at your facility located at 700 Belleville Ave, New Bedford, Massachusetts (“Facility”).

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner / operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

The Acushnet Company’s Custom Golf Ball Plant “C” is located at 700 Belleville Ave., New Bedford, MA. The facility’s processes include custom printing, decal application, and spraying of golf balls manufactured by Acushnet in other facilities in Massachusetts. Research & Development activities are also conducted on-site.

In this Application, Acushnet requests:

- Installation of one new centrifugal parts washer , increasing the facility’s inventory from five to six parts washers.
- Installation of five new 1-2 color manual closed cup pad printing machines.
- Installation of two new five color single head printing machines.
- Replacement of four print heads on two existing Auto Pad Classic printing machines.

Best Available Control Technology is stated in Table 2.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Quantity	Pollution Control Device (PCD)
1	Custom Pad Printers	54 total: 47 existing, plus 7 newly approved	none
2	Custom Spray Booth 40” wide x 70” high x 40” deep	1 existing	Supra I and Supra I Mini-mesh filter media (or equivalent)
3	Cleaning Operations	Not applicable	none
4	Centrifugal Parts Washers	5 existing plus 1 newly approved	none
5	Research and Development Equipment	1 paint booth and 1 pad printer	Supra EPG arrestor pads (or equivalent)
6	Natural Gas-Fired Boilers, Cleaver Brooks Model No. CB(LE)700-125-1, each equipped with Low NO _x Flue Gas Recirculation burner technology, each at 5.230MMBtu/hr	2 existing	none
7	Emergency Generator, Olympian Model No. D100P1, 1.1 MMBtu/hr, Installed in 2001, exempt from Plan Approval per 310 CMR 7.02(2)(b)29.a.	1 existing	none

Table 1 Key:

EU# = Emission Unit Number
PCD = Pollution Control Device
NO_x = Nitrogen Oxides
MMBtu/hr = Million British thermal units per hour

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION, AND EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2, below:

Table 2				
EU#	Operational / Production Limit		Air Contaminant	Emission Limit
1	478 gallons of ink used per month		VOC	1.29 TPM 7.5 TPY
	2,775 gallons of ink used per consecutive 12-month period			
	Maximum VOC content of 5.387 pounds per gallon of ink			
	Maximum VOC content of 17.479 pounds per gallon of solid (with reducing solvent)			
2	Surlyn paint	508 gallons used per month	VOC	1.76 TPM 6.7 TPY
		4.23 lb VOC/gal paint as applied		
		9.75 lb VOC/gal solids as applied		
		8.31 lb/gal applied		
		4734 coats/gal minimum transfer efficiency		
	Balata paint	128 gallons used per month		
		6.33 lb VOC/gal paint as applied		
		40.67 lb VOC/gal solids as applied		
		7.815 lb/gal applied		
		4035.5 coats/gal minimum transfer efficiency		
	Urethane paint	108 gallons used per month		
		5.249 lb VOC/gal paint as applied		
		19.4014 lb VOC/gal solids as applied		
		8.102 lb/gal applied		
4760.2 coats/gal minimum transfer efficiency				

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
	3,702 gallons of all paint (combined) used per consecutive 12-month period		
	Achieve a minimum particulate control efficiency of 97%	PM	0.1 TPY
3	433 gallons of cleaning solvent used per month	VOC	1.75 TPM 8.65 TPY
	2,154 gallons of cleaning solvent used per consecutive 12-month period		
	8.03 pounds per gallon of cleaning solvent		
	518 gallons of Methyl Ethyl Ketone (MEK) used per month		
	2,591 gallons of MEK used per consecutive 12-month period		
4	228 gallons of centrifugal parts washing solvent used per month	VOC	0.91 TPM 6.31 TPY
	1,592 gallons of centrifugal parts washing solvent used per consecutive 12-month period		
	7.92 pounds per gallon of centrifugal parts washing solvent, as applied		
5	4.6 tons as contained in the raw materials used in R&D activities per consecutive 12-month period	VOC	4.6 TPY
	0.02 tons as contained in the raw materials used in R&D activities per consecutive 12-month period	PM	0.02 TPY
	Achieve a minimum particulate control efficiency of 97.5%		
6	Natural-gas fired only, based on 8,760 hours of operation.	VOC	0.25 TPY ¹
		PM	0.34 TPY ¹
	NO _x emissions from each boiler shall not exceed 0.035 pounds per MMBtu	NO _x	1.60 TPY ¹
7	Less than or equal to 300 hours of operation per consecutive 12-month period including normal maintenance and testing procedures & emergencies	NO _x	0.73 TPY ²
Facility-wide		VOC	34.01 TPY
		PM	0.46 TPY
		HAP (single)	9.9 TPY
		HAPs (total)	24.9 TPY
		NO _x	2.33 TPY
		Visible Emissions ³	0% opacity

Table 2 Key and Footnotes:

EU# = Emission Unit Number

NO_x = Nitrogen Oxides

- SO₂ = Sulfur Dioxide
- PM = Total Particulate Matter
- VOC = Volatile Organic Compounds
- HAP (single) = maximum single Hazardous Air Pollutant
- HAPs (total) = total Hazardous Air Pollutants
- TPM = tons per month
- TPY = tons per consecutive 12-month period
- MEK = Methyl Ethyl Ketone
- R&D = Research and Development
- MMBtu = Million British thermal units
- lb = pounds
- gal = gallon
- % = percent
- 1 = total for 2 boilers, listed for facility-wide annual aggregate emissions accounting
- 2 = listed for facility-wide annual aggregate emissions accounting
- 3 = exclusive of uncombined water vapor

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
6	1. In accordance with 310 CMR 7.04(4)(a), EU#6 shall be inspected and maintained in accordance with the manufacturer's recommendations and tested for efficient operation at least once in each calendar year. The results of said inspection, maintenance, and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near the Facility.
Facility-wide	2. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration. 3. The Permittee shall conduct emission testing, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13, for MassDEP required stack emission testing.

Table 3 Key:

EU# = Emission Unit Number

Table 4	
EU#	Record Keeping Requirements
Facility-wide	1. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. The Permittee may use a record keeping system that contains the information equivalent to the electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, which can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .

Table 4	
EU#	Record Keeping Requirements
	2. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	3. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) and PCD(s) approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	5. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; and the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	6. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	7. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	8. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

- EU# = Emission Unit Number
- PCD = Pollution Control Device
- SOMP = Standard Operating and Maintenance Procedure
- USEPA = United States Environmental Protection Agency

Table 5	
EU#	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Southeast Regional Office of MassDEP, BWP Compliance & Enforcement (C/E) Chief by telephone (508) 946-2878, email sero.air@state.ma.us or fax (508) 946-2865 or (508) 947-6557 as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to the C/E Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall report to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.

Table 5	
EU#	Reporting Requirements
	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:

EU# = Emission Unit Number

C/E = Compliance & Enforcement

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
1	<p>1. The Department approves Acushnet's request to install five new 1-2 color manual closed cup pad printing machines, two new five color single head printing machines, and four replacement heads for two existing Auto Pad Classic printing machines as described in Application SE-12-040.</p> <p>2. Acushnet shall not use the pad printing machines for any wood or paper items.</p>
1, 2	<p>3. Acushnet shall limit VOC emissions from the paint coating and ink operations by using only those paint coatings and inks specified in a coating table maintained by Acushnet. Acushnet is responsible for the completeness and accuracy of the coating table, including VOC and solids content information. Additional paint coatings and inks may be applied at the minimum transfer efficiencies listed in Table 2, provided that prior to use of any new paint coating and ink formulations, Acushnet must:</p> <ul style="list-style-type: none"> a. Maintain an updated coating table with accurate Revision No. and date. Acushnet shall also maintain on file a BWP AQ Coatings & Inks form (with calculations and VOC test data if available) for the maximum application rate of the proposed new coating(s) and ink(s). b. Ensure that use of any new coating(s) and ink(s) shall not cause the facility to exceed the maximum VOC to solids ratio limit on a VOC per gallon of solids (as applied) basis as listed in Table 2 c. If any new coating or ink exceeds the limits contained in Table 2, Acushnet must obtain MassDEP approval prior to the production application of the coating(s)/ink(s).

Table 6	
EU#	Special Terms and Conditions
4	4. Acushnet shall not operate more than five (5) centrifugal parts washers at any one time.
Facility-wide	5. The approvals previously issued to the Facility, as listed below, are superseded herein: <ul style="list-style-type: none"> • SE-11-032, Transmittal No. X239670, dated March 2, 2012, • 4P10002, Transmittal No. X231228, dated March 16, 2010, • 4P06027, Transmittal No. W088385 dated September 28, 2006, • 4P03014, Transmittal No. W040441, dated November 11, 2003, • 4P03014, Transmittal No. W040441, dated November 4, 2003, • 4B99052, Transmittal No. 137851, dated January 20, 2000, • 4P99046, Transmittal No. 137850, dated December 7, 1999, • 4P98005, Transmittal No. 114711, dated February 27, 1998, • 4P96139, Transmittal No. 114010, dated March 21, 1997, • 4P95182, Transmittal No. 114011, dated December 21, 1995, • 4P94106, Transmittal No. 79724, dated December 21, 1995. <p>The above listed approvals shall be deemed null and void. The underlying applications for all previous Approvals shall remain valid.</p>
	6. The Facility may reconcile the VOCs contained in any hazardous waste shipped during the month when determining monthly emissions. The facility shall maintain hazardous waste disposal records and purchase records for VOC containing materials, such that the Department may check these for consistency with plant logs. Such records shall verify the VOCs, and the quantity present, in the waste being shipped if reconciling monthly emissions.
	7. The Facility shall store and dispose of VOCs and HAPs in a manner that will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover. Proper disposal shall be in a manner consistent with all applicable regulations.
	8. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.

Table 6 Key:

EU# = Emission Unit Number

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as "shanty caps" and "egg beaters." The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (inches)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1	75	22	10	Approximately 70
2	45	14	40 - 60	Approximately 70
4*	45/65(new)	12/12	40 - 60/25-35	Approximately 70

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

*new also serves ink mixing

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that construction or demolition shall be done in accordance occur which 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.

- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Dan Kamieniecki by telephone at (508) 946-2717, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Thomas Cushing
Permit Section
Bureau of Waste Prevention

Enclosure

ecc: New Bedford Fire Dept.
New Bedford Board of Health
M. Pinaud – MassDEP/SERO
L. Black – MassDEP/SERO
Y. Tian – MassDEP/Boston
D. Raczynski – Epsilon Associates, Inc.
K. Kelly – Acushnet Co.