



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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June 7, 2012

Don Tremblay  
Berry Plastics Corporation  
44 O'Neill Street  
Easthampton, MA 01027

**Re: Easthampton**  
Transmittal No.: X251649  
Application No.: WE-12-010  
Class: SM80-7  
FMF No.: 387460  
**Air Quality Plan Approval**

Dear Mr. Tremblay:

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 installation of a new process line at Berry Plastics Corporation, 44 O'Neill Street, Easthampton, Massachusetts ("Berry Plastics").

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 Berry Plastics must comply in order for the Facility to be operated in compliance with this Plan Approval.

## **1. DESCRIPTION OF FACILITY AND APPLICATION**

Berry Plastics is a manufacturer of injection-molded plastic packaging. They make plastic squeeze tubes and caps for the cosmetic, personal care, pharmaceutical, and household chemical market. They received on May 23, 2006, under the name of "Tubed Products, L.L.C.", a Plan Approval from MassDEP for new and existing equipment at their Easthampton, Massachusetts facility.

Berry Plastic proposes to install a new process line designated Inline #11 (I P11). This process line will consist of an extruder, a header/capper, two in-line printers including a post cure oven, and a packing machine. This process line is similar to the other existing production lines at the facility except it will produce tubes approximately 50% faster (150 tubes/min vs. 100 tubes/min).

Berry Plastics receives palletized plastic resin which is stored in one of 7 resin silos at the facility. The plastic resin will be extruded through the new extruder machine having 4 extrusion heads which can be utilized one at a time. Two of these extrusion heads will produce plastic tubes with a 60 mm diameter, while the other two heads will produce plastic tubes with a 30 mm diameter. After the extrusion step, the plastic tube will be a cylinder with two open ends.

Next, the tubes will be sent into the header/capper machine where the tube will have a head put onto it. The tubes will then be sent through the printing machines, which will apply inks and UV coatings. The new process line printer will use coatings identical to those currently used on the existing line printers. The proposed printers will have a 1 gallon reservoir containing cleaning solvents, which include isopropyl alcohol, isopropyl acetate and ethanol. After the printers, the plastic tubes will enter an electric UV curing oven followed by a packing machine.

The sources of VOC emissions from the new process line are the printer coatings (48% of the total), printer cleanup solvents (51% of the total), and the extruder (1% of the total). Printer VOC emissions will be exhausted to the ambient air through a stack 37.3 feet above ground level and 11.7 feet above the roof. The stack exit diameter will be 2.2 feet and the exit velocity will be 5.8 feet per second at 95°F.

The potential VOC emissions from the proposed process line, based on using only the worst-case VOC content coating for the printers and 8760 hours per year operation, is 4.7 tons per year.

Berry Plastics also reports in this Air Quality Plan Approval that the process equipment formerly designated EP23 has been renamed to IP07, and that the following equipment has been removed from the facility since the 2006:

EW01	EW05	EV02
EW02	EW06	In-line dip tank (168 gallons, Safety Kleen Model 81)
EW03	EW08	

**2. EMISSION UNIT (EU) IDENTIFICATION**

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

<b>Table 1</b>			
<b>Emission Unit #</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device</b>
EU #6	<b>Printers/Extruders</b> IP01-05 (5 printers) EP09-13 & EP16-22 (12 printers) EV04-08 (5 printers) ED01 (1 printer)  EW04 & EW07 (2 printers) IP07 (1 printer) <b>New IP11 (2 printers)</b>	various	none
EU #22	<b>Dip Tanks</b> WIFAG Dip Tank – (Safety Kleen Model 81)  Ink Lab Dip Tank  Deco Dip Tank  Machine Shop Dip Tank (Safety Kleen Model 81)	168 gallons   5 gallons  168 gallons  168 gallons	none

**3. APPLICABLE REQUIREMENTS**

**A. Operational, Production and Emission Limits**

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

<b>Table 2</b>			
<b>Emission Unit #</b>	<b>VOC Emission Limits</b>	<b>Facility-Wide VOC Emissions</b>	
		<b>lb/month</b>	<b>tons/year</b>
EU #6 Printers/Extruders	$\leq 3.4$ lb VOC/gallon solids applied	$\leq 8000$ total (calendar month)	$\leq 47.5$ total (rolling 12- month total)
EU #22 Dip Tanks	$< 100$ gallons solvent per calendar month		
Facility-Wide	Estimated VOC emissions must be included in calculations of facility-wide VOC emissions and in determining compliance with facility-wide emission limits.		

**B. Compliance Demonstration**

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

<b>Table 3</b>	
<b>EU#</b>	<b>Monitoring and Testing Requirements</b>
EU #6	1. Berry Plastics shall perform, at the request of the MassDEP or EPA, tests to characterize VOC and solids contents of the coatings used.
EU #22	2. Berry Plastics shall, in accordance with 310 CMR 7.18(8)(g), upon request of the MassDEP or EPA, perform or have performed tests to demonstrate compliance with 310 CMR 7.18(8).
Facility-wide	3. Berry Plastics shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.  4. If and when MassDEP requires it, Berry Plastics shall conduct emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13.

<b>Table 4</b>	
<b>EU#</b>	<b>Record Keeping Requirements</b>
EU #6	5. Berry Plastics shall maintain records of the VOC content of all coatings (lb VOC/gallon solids).
EU #22	6. Berry Plastics shall maintain records of the number of gallons of solvent used in the dip tanks for each calendar month.
Facility-wide	7. Berry Plastics shall maintain records of the pounds of VOC emitted facility-wide for each calendar month and for each rolling 12-month period.  8. Berry Plastics shall maintain all records on-site for a minimum of five years and shall make these records available to the MassDEP upon request.

<b>Table 5</b>	
<b>EU#</b>	<b>Reporting Requirements</b>
Facility-wide	<p>9. Berry Plastics shall generate monthly reports in-house that document the compliance with the limits specified in Table 2 of this Plan Approval. If any emission limit(s) is exceeded, Berry Plastics shall notify the MassDEP in writing no later than the 15<sup>th</sup> day of the following month.</p> <p>10. Berry Plastics shall submit to the MassDEP semi-annual reports by July 30<sup>th</sup> for the 6 month period January–June of a calendar year, and by January 30<sup>th</sup> for the 6 month period July–December of a calendar year. Each semi-annual report shall consist of the individual monthly reports specified in provision 9. above.</p> <p>11. Berry Plastics 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).</p> <p>12. Berry Plastics shall notify the Western Regional Office of MassDEP, BWP Permit Chief by telephone at (413) 755-2115, by email at <a href="mailto:Marc.Simpson@state.ma.us">Marc.Simpson@state.ma.us</a>, or fax at (413) 784-1149 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 Marc Simpson, Permit 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).</p> <p>13. Berry Plastics shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.</p>

**4. SPECIAL TERMS AND CONDITIONS**

Berry Plastics shall comply with the Special Terms and Conditions as contained in Table 6 below:

<b>Table 6</b>	
<b>EU#</b>	<b>Special Terms and Conditions</b>
Facility-Wide	<p>14. Berry Plastics shall keep clean-up solutions containing VOCs in tightly covered containers during transport and storage; and cleaning rags used in conjunction with the cleanup solution shall be placed, when not in use, in closed containers and collected for proper disposal.</p> <p>15. Berry Plastics shall store and dispose of all volatile organic compounds in a manner which will minimize evaporation to the atmosphere.</p>

**5. GENERAL CONDITIONS**

Berry Plastics 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, if 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 of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 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. If there are 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.

If you have any questions concerning this Plan Approval, please contact John Kirzec by telephone at (413) 755-2225 or in writing at the letterhead address.

Sincerely,

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.

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Marc Simpson  
Permit Chief  
Bureau of Waste Prevention  
Western Region

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