



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

DEVAL L. PATRICK
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RICHARD K. SULLIVAN JR.
Secretary

KENNETH L. KIMMELL
Commissioner

January 27, 2012

Mr. Frank Wheelwright, Site Manager
Dresser Industries Inc.
85 Bodwell Street
Avon, MA 02322

RE: FINAL APPROVAL OF LPA NON-FUEL EMISSIONS:

Application No.: SE-12-001
Transmittal No.: X241715
Source No.: 119-2125

AT: Dresser Industries Inc.
85 Bodwell St.
Avon

Dear Mr. Wheelwright:

The Department of Environmental Protection, Bureau of Waste Prevention, has determined that the referenced Limited Plan Application (“LPA”), is administratively complete and in conformance with current air pollution control practices. The Department approves LPA No. SE-12-001 for a new process at an existing industrial valve manufacturing facility at Dresser Industries Inc., (herein referred to as “Facility” or “Dresser”), 85 Bodwell St., Avon, Massachusetts.

Emissions from the facility include volatile organic compounds (VOCs), Hazardous Air Pollutants (HAPs), particulate matter (PM), and diatomic nitrogen (a non-criteria pollutant).

The LPA was submitted in accordance with 310 CMR 7.02(1), (3), and (4) of the Air Pollution Control Regulations (“Regulations”), 310 CMR 7.00, as adopted pursuant to M.G.L. c.111, sections 142A-142K.

Included as part of the LPA Approval are the following:

- *Stamped approved BWP AQ 01-B Application Form stamped January 7, 2012,*
- *Supplemental information received January 25 and 27, 2012,*
- *General Conditions for Non-Fuel Emissions LPAs,*
- *Special Conditions, and*
- *Appeal Rights*

Please review the entire LPA Approval carefully as it stipulates the conditions that the facility owner / operator must adhere to for the facility to be constructed / reconstructed / altered and operated in compliance with the Regulations.

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

Should you have any questions concerning this FINAL APPROVAL, please contact Dan Kamieniecki at (508) 946-2717.

Very truly yours,

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.

John K. Winkler, Chief
Permit Section
Bureau of Waste Prevention

W/DK/

Enclosure: Appeal of Approval

cc: J. Winkler, DEP/SERO
ecc: L. Carlson, DEDP/SERO
J. Winkler, DEP/SERO
L. Black, DEP/SERO
Y. Tian, DEP/Boston
M. Vedrani, Dresser Industries Inc.
M. Ayer, Ayer Quality Engineering LLC
Avon Board of Health
Avon Fire Dept.

GENERAL CONDITIONS FOR NON-FUEL EMISSION LPAS

1. Operation - No person shall operate a facility constructed, substantially reconstructed, or altered pursuant to 310 CMR 7.02(1), (3), and (4) except in conformance with the requirements established therein and in conformance with the specific written plan approval requirements.
2. Recordkeeping - The facility owner/operator shall establish an on site recording system. All records shall be maintained up-to-date such that year-to-date information is readily available for Department examination. Recordkeeping shall, at a minimum, include:
 - a) The initiation and completion dates for the proposed construction/ reconstruction/ alteration.
 - b) Malfunctions - A record of all malfunctions including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed and the facility returned to compliance.
 - c) Records shall be maintained documenting the air contaminant emission analysis supporting the response to LPA-Process (BWP AQ 01) Section H.
 - d) All records shall be kept on site for five (5) years from date of record and shall be made available to the Department upon request.
3. The Regional Bureau of Waste Prevention office must be notified by telephone or fax as soon as possible after the occurrence of any upsets or malfunctions to facility equipment, air pollution control equipment, or monitoring equipment that result in an excess emission to the air or a condition of air pollution.
4. The Department must be notified in writing within 30 days of commencement of construction and completion of this approved installation.
5. The Department may revoke, in accordance with 310 CMR 7.02(3)(k), any plan approval if the actual construction has not begun within two years from the date of issuance or if, during the construction, the construction is suspended for the period of one year or more.
6. Reporting - Any construction, substantial reconstruction or alteration, as described in 310 CMR 7.02(1), (3), and (4) at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to the Department on the next required source registration.
7. This approval may be suspended, modified, or revoked by the Department if, at any time, the Department determines that the facility is violating any condition or part of this LPA Approval. The Department shall be notified in writing before any modification of the facility such as a change in raw materials or an increase in production capacity that may increase emissions.

GENERAL CONDITIONS FOR NON-FUEL EMISSION LPAs

8. Opacity, exclusive of uncombined water, shall not exceed 10% at all times during all modes of operation, including startups and shutdowns. Visible emissions or opacity that exceeds the limits set forth in this approval shall be reported to the Department in writing or by fax within seven (7) days of the occurrence.
9. Noise from the facility during construction, initial startup and routine operation, including startups and shutdowns, shall not exceed the Department noise guidelines and shall not cause a condition of air pollution as defined in 310 CMR 7.01 and 7.10.
10. The facility shall be constructed and operated in a manner to prevent the occurrence of dust or odor conditions that cause or contribute to a condition of air pollution as defined in 310 CMR 7.01 and 7.09.
11. This Final Approval does not negate the responsibility of owner/operator of the referenced facility to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this approval imply compliance with any other applicable federal, state, or local regulations now or in the future.
12. Emission Testing - The Department may, in accordance with Regulation 310 CMR 7.13, require source emission testing ("stack testing"). All emission testing shall be conducted in accordance with the Department's Guidelines for Source Emission Testing and with 310 CMR 7.13.
13. Should asbestos remediation/removal be required because of the approved construction/reconstruction/or alteration of this facility, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15 in its entirety and 310 CMR 4.00.

SPECIAL CONDITIONS FOR NON-FUEL EMISSION LPAS

On September 13, 2010, the Department issued Approval 4P10023 to Dresser for the installation and operation of a new paint spray booth, and to consolidate previous approvals. This Approval (SE-12-001) is issued to provide clarifying language, and approve a new process, in a consolidated Approval.

Best Available Control Technology (BACT) for the paint spray booth has been identified as a design and operation in a manner consistent with the paint spray booth exemption regulations contained in 310 CMR 7.03(16) except that the Facility is not bound by the paint usage and emission restrictions in 310 CMR 7.03(16)(a) and (c). Alternative limitations are established herein. Booth 3 is subject to the same design and operational requirements established herein, superseding a previous approval for Booth 3. A previous approval for a valve integrity testing (i.e. "Magnaflux") operation is superseded; all associated requirements are incorporated herein. All particulate matter (PM) emissions including PM from spray painting and sandblasting are exempt from plan approval in accordance with 310 CMR 7.02(2)b.7.

In this Application (SE-12-001), Dresser has requested to install and operate a cryogenic test process, resulting in the discharge of man-made diatomic nitrogen (N₂) to the atmosphere. The discharge of this material meets the definition of "Air Contaminant" as contained in 310 CMR 7.00.

The Department recognizes the paint spray booth described in Application 4P10023 as being equipped with two (2) discharge stacks to the atmosphere, and one (1) manometer gauge to measure pressure drop in the paint spray booth.

The Department recognizes miscellaneous processes at the facility generate HAP emissions that exhaust to the atmosphere. These processes are exempt from Plan Approval based upon a *de minimus* increase in emissions. These emissions, however, are not exempt from facility-wide limits contained in the Special Condition No. 1 of this Approval. Dresser has an obligation to maintain appropriate records to maintain compliance with the exempt status.

SPECIAL CONDITIONS FOR NON-FUEL EMISSION LPAS

1. The Facility shall limit emissions as follows:

Process	VOC		HAPs ¹		Non-Criteria Pollutant (Diatomic Nitrogen)	
	lb / yr ²	lb / month ³	lb / yr ²	lb / month ³	lb / yr ²	lb / month ³
Spray coating ⁴	19,620	9,800	19,620	9,800		
Magnaflux ⁵	180	180				
Cryogenic testing					9,800	4,000
Facility-Wide Total	19,800	9,980	19,620 ⁶	9,800 ⁶	9,800	4,000

Notes:

1. Maximum single HAP and total HAPs.
 2. lb / yr – pounds per year, based on a consecutive 12-month period.
 3. lb / month – pounds per month
 4. All spray booths.
 5. The Facility may use other materials for valve integrity testing provided it has the same or lower VOC content.
 6. Includes emissions from processes exempt from Plan Approval based upon a *de minimus* increase in emissions.
2. All coatings used at the Facility shall comply with the “as-applied” formulations contained in 310 CMR 7.18(11) “Surface Coating of Miscellaneous Metal Parts and Products.” Notwithstanding the previous statement, the Facility may use up 250 gallons of coating per consecutive 12-month period that is exempt from the “as-applied” formulations contained in 310 CMR 7.18(11). The emissions from the “exempt” coatings must be incorporated into the Facility’s emissions for purposes of determining compliance with the emission limitations contained in this Approval, subject to the following provisions:
- Usage shall be limited to 250 gallons per month and 250 gallons per consecutive 12-month period.
 - The maximum VOC / HAP content shall not exceed: 10.3 pounds per gallon of solids, as applied.
3. The Facility shall maintain records on a **daily** basis to document compliance with the spray coating emission limitations in provision 1. At the beginning of each month, the Facility shall calculate process and facility-wide VOC and HAP emissions from the prior month and the previous 12-month period. The Facility shall also calculate the quantity of coatings with a VOC content above 6.7 lb/gallon of solids (i.e. subject to the 250 gallon limit contained in provision 2) used in the previous month and the previous 12-month period.

SPECIAL CONDITIONS FOR NON-FUEL EMISSION LPAS

4. The Facility shall limit the quantity of Magnaflux used as follows:
 - 35 gallons per month.
 - 35 gallons per consecutive 12-month period.
5. The Facility shall limit the quantity of Diatomic Nitrogen used as follows:
 - 4,000 pounds per month.
 - 9,800 pounds per consecutive 12-month period.
6. The approvals previously issued to the Facility, as listed below, are superseded herein:
 - SM-85-066-IF, dated January 8, 1986,
 - 4P90191, dated December 24, 1990,
 - 4P94094, Transmittal No. 87936, dated July 15, 1994,
 - 4P97103, Transmittal No. 115042, dated March 20, 1998,
 - 4P00060, Transmittal No. 41003874, dated December 6, 2000,
 - Interim Approval dated August 11, 2010,
 - 4P10023, Transmittal No. X234020, dated September 13, 2010.

The above listed approvals shall be deemed null and void. The underlying application for LPA No. 4P10023 shall remain valid.

7. A detailed record keeping system shall be maintained to verify the compliance status of all conditions of this approval, including VOC and HAP content of all coatings, thinners and clean-up solutions used in spray coating operations, Magnaflux used, and diatomic nitrogen used.
8. The facility shall be operated in strict accordance with the application approved herein. Should there be any differences between the aforementioned application and this approval letter, this approval letter shall govern.
9. The facility shall comply with all conditions contained in this Final Approval. Should there be any differences between conditions contained in the "General Conditions" and the conditions contained in the "Special Conditions" of this Final Approval, the "Special Conditions" shall govern.

APPEAL OF APPROVAL

This Approval is an action of the Department. 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 Approval.

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

The hearing request along with a valid check payable to 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

The 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.

The Department 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.