



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

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

RICHARD K. SULLIVAN JR.
Secretary

KENNETH L. KIMMELL
Commissioner

October 21, 2011

Mr. Bruce Wooley
Manager of Environmental R&D and Safety
Interprint, Inc.
101 Central Berkshire Boulevard
Pittsfield, MA 01201

Re: BAPCD - Pittsfield
Regulation 310 CMR 7.02
Appl.# 1-P-11-013; Trans. #X238549
Limited Plan Application
Lab Printing Press #4

FINAL APPROVAL

Dear Mr. Wooley:

The Department of Environmental Protection, Western Regional Office ("MassDEP") has determined that the referenced Limited Plan Application ("LPA") is administratively and technically complete and in conformance with current air pollution control engineering practices. MassDEP approves the referenced LPA authorizing the proposed construction, substantial reconstruction and/or alteration, and subsequent operation, of the referenced equipment by Interprint, Inc. ("Interprint") at their facility located in Pittsfield, Massachusetts.

This LPA Approval is in accordance with 310 CMR 7.02(4) of the Air Pollution Control Regulations ("Regulations"), 310 CMR 7.00, as adopted pursuant to M.G.L. c.111, sections 142A-142O.

Included as part of the LPA Approval are the following:

General Conditions for Non-Fuel Emission LPAs,
Appeal Rights, and
Special Conditions (if any).

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

Interprint, Inc.
Appl. #1-P-11-013; Trans.#X238549
Page 2 of 7

The MassDEP has determined that the filing of an Environmental Notification Form (“ENF”) with the Secretary of Environmental Affairs, for air quality purposes, was not required prior to this action by the MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act and Regulation 301 CMR 11.00, section 11.03, provide certain “Fail-Safe Provisions” which 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 John Kirzec at (413) 755-2225.

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.

Marc Simpson
Permit Chief
Western Region

JK/jk
interprint lab press 4 lpa appl.1-P-11-013.doc

cc: DEP, One Winter Street, Boston, Attn: Yi Tian
Peter Czapienski, WERO

Certified Mail 7009096000065058452

Introduction

MassDEP issued on September 29, 2011 a Final Approval to Interprint for a facility-wide determination of volatile organic compound ("VOC") emission rate equivalent to Best Available Control Technology ("BACT") and Lowest Achievable Emission Rate ("LAER") for the various emission sources at their Pittsfield location. The Approval also established a facility-wide annual mass emission restriction for VOC, total hazardous air pollutants ("HAP"), and for single HAPs. BACT is also determined for the other air emitting sources at the facility.

In this LPA, Interprint is proposing to remove an existing lab press (Lab Printing Press #2; Kochsiek Model No. 88) and replace it with a similar lab press (to be designated as Lab Printing Press #4; Kochsiek Model No. 212H) that is currently located at an Interprint facility in Italy. This press will be operated with the same inks that currently are used on Lab Printing Press #2 and the other presses at the facility. The new press is slightly wider (0.64 meters vs. 0.60 meters) and operates at the same line speed as the press it replaces.

The potential VOC emissions from the new press will be 2.8 tons per year, based on 1,095 hours per year operation. The increase compared to the press it replaces will be less than 500 pounds VOC per year.

Heat for drying on Lab Printing Press #2 has been provided by a propane-fired hot oil system, whereas Lab Printing Press #4 will utilize a conventional propane fired dryer with a maximum heat input rating of approximately 607,400 Btu/hr.

Interprint will continue to operate within the facility-wide limits that were established in the September 29, 2011 Final Approval, which caps facility-wide VOC emissions at 49 tpy, total HAP at 24.5 tpy, and single HAP at 9.8 tpy each.

SPECIAL PROVISIONS OF APPROVAL

1. Interprint shall limit VOC emissions from Lab Printing Press #4 as follows during all periods of operation.
 - a. In the development of new designs, Interprint shall use coatings with VOC contents no greater than the contents listed in the Coatings List in the Appendix of this Final Approval. If Interprint uses a new coating to replace an existing coating, the new coating will have a VOC content no greater than the coating it is replacing.
 - b. In processing limited production orders Interprint shall use coatings with VOC contents no greater than the contents listed in the Coatings List. If Interprint uses a new coating to replace an existing coating on the Coatings List, the new coating will have a VOC content no greater than the coating it is replacing.
 - c. If, for purposes of new product development, Interprint develops a new type of coating that does not replace an existing coating on the Coatings List, and that has a higher VOC content than any of its existing coatings on the

Coatings List, Interprint may evaluate such a coating on Lab Printing Press #4 and limit emissions to 5.3 lb VOC/hour over an 8-hour averaging period.

After conducting such a coating development process but before commencing production using a new coating, Interprint shall document that it has developed a coating with the lowest VOC content possible. Interprint shall document this process through its trial reports and other relevant records, and keep these records on-site and available for review. In the event that Interprint's actual annual emissions for any new product development will exceed one ton VOCs per year, Interprint shall submit a permit application to MassDEP in accordance with Regulation 310 CMR 7.02.

2. Interprint shall limit its facility-wide emissions to 49.0 tpy VOC, 24.5 tpy total HAP, and 9.8 tpy single HAP, based on a rolling twelve month total.

MONITORING / TESTING REQUIREMENTS

3. Interprint shall track on a calendar month basis the use of all VOC and HAP in Lab Printing Press #4 such that compliance with all of the emission limits specified in this Final Approval can be determined.
4. Interprint shall monitor and keep records on a calendar month basis for the Lab Printing Presses #4:
 - a. The type of coatings used in each machine;
 - b. Gallons of each coating applied;
 - c. The VOC and HAP content of the coatings used;
 - d. The pounds of VOC and HAP emitted by each machine;
 - e. The identity, quantity, formulation and density of any diluent(s) and clean-up solvent(s) used; and
 - f. The total pounds of VOC and HAP emitted from the facility.

RECORDKEEPING

5. Interprint shall generate monthly reports in-house, by the 15th day of the following month, that document compliance with the rolling 12-month total emission limits and production limits specified in this Final Approval.

GENERAL CONDITIONS OF APPROVAL

1. Interprint shall allow authorized MassDEP representatives immediate access to the facility in order to take samples, view the process operation or examine records to verify compliance.
2. This Approval may be suspended, modified, or revoked by MassDEP if, at anytime, MassDEP determines that any condition or part of this Approval is being violated. MassDEP shall be notified in writing prior to any modification of the facility such as a change in raw materials or an increase in production capacity that may increase emissions.
3. Interprint shall operate a facility constructed, substantially reconstructed, or altered pursuant to 310 CMR 7.02 except in conformance with the requirements established therein and in conformance with the specific written plan approval requirements.
4. Reporting – Any construction, substantial reconstruction or alteration, as described in 310 CMR 7.02, at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to MassDEP on the next required source registration.
5. Interprint shall ensure that noise from the facility during construction, initial startup and routine operation, including startups and shutdowns, shall not exceed MassDEP noise guidelines and shall not cause a condition of air pollution as defined in 310 CMR 7.01 and 7.10.
6. Interprint shall ensure the facility is operated in a manner to minimize the occurrence of dust or odor conditions which cause or contribute to a condition of air pollution as defined in 310 CMR 7.01 and 7.09.
7. Interprint shall operate the facility in a manner to minimize the occurrence of visible emissions, which cause or contribute to a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.06.
8. This Final Approval (Amended) 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 regulation now or in the future.
9. Should asbestos remediation/removal be required as a result of the approved construction/reconstruction/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.

This Final Approval consists of the application materials and this Approval letter. If conflicting information is found between these two documents, then the requirements of this Approval letter shall take precedence over the documentation in the application materials.

MassDEP has determined that the filing of an Environmental Notification Form (“ENF”) with the Secretary of Environmental Affairs, for air quality purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act and Regulation 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 Environmental Impact Report at a later time.

APPEAL RIGHTS

This Final 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 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 Final 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) 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.

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.

Appendix Coating List (9/29/2011)

Coating Identification	Coating Percent VOC
Ex -1	0.91%
Ex-2	0.18%
Ex-3	0.18%
Ex-4	1.56%
YI-1	0.79%
On -2	0.95%
Re -1	0.67%
Re-2	0.98%
Be -1	1.16%
BI-1	4.90%
BI-2	1.30%
BI-3	1.30%
BI-4	1.30%
Wt-1	1.80%
Wt-2	0.30%
Wt-3	0.47%
Wt-4	0.53%
YI-2	0.53%
Re-3	1.50%
Ex-5	1.81%
Ex-6	3.48%
Pe -1	1.80%
Pe-2	1.00%
Pe- 3	1.00%
Pe-4	1.80%
Pe-5	1.70%
Pe-6	2.10%
Pe-7	1.80%
Pr -1	0.10%
Pr- 2	0.10%
Sb-1	43.80%
Cl-1	50.00%
Df-1	0.00%
Gw-1	0.00%
PI-1	1.80%
PI-5	0.06%
PI-2	0.60%
PI-6	1.00%
PI- 3	1.40%
PI-7	0.06%
PI-4	3.50%
PI- 8	0.04%