



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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October 26, 2011

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

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

Final Approval (amended)

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 Final 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 Final Approval are the following:

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

Please review the entire LPA Final 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.

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.

Please be advised that this Final Approval (amended) corrects errors in provisions 3 and 4 of the October 21, 2011 Final Approval issued by MassDEP, and replaces it in full.

Should you have any questions concerning this Final Approval (amended), 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

Certified Mail: 7009 0960 0000 6506 1674

JK/jk
interprint lab press #4 2011-10-26 lpa #1-P-11-013.doc

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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 Final 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 Press L-2; Kochsiek Model No. 88) and replace it with a similar lab press (to be designated as Lab Press L-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 Press L-2 and the other presses at the facility. The new press is slightly wider (0.64 meters vs. 0.60 meters) than Lab Press L-2 which it replaces, but will coat products of the same widths.

Interprint estimates potential VOC emissions from the new press at 2.8 tons per year. The increase compared to the press it replaces will be less than 500 pounds VOC per year.

Heat for drying on Lab Press L-2 has been provided by a propane-fired hot oil system, whereas Lab Press L-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 49.0 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 Press L-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 Appendix of the September 29, 2011 Final Approval ("Coatings List"). 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 Press L-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.
3. Interprint shall track on a calendar month basis the use of all VOC and HAP in the Lab Presses (L-1, L-3, and L-4 collectively) 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 Presses (L-1, L-3, and L-4 collectively):
 - a. The type of coatings used in each machine;
 - b. Pounds of each coating applied;
 - c. The VOC and HAP content of the coatings used; and
 - d. The pounds of VOC and HAP emitted by the Lab Presses (L-1, L-3, and L-4 collectively).
5. Interprint shall monitor and keep records on a calendar month basis, the total pounds of VOC and HAP emitted from the entire facility.
6. 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.
7. Interprint shall submit to the MassDEP two compliance summaries, one by January 30 for the time period July – December of the previous calendar year, and the other by July 30 for the time period January – June of the current calendar year, covering facility-wide compliance with Regulation 310 CMR 7.00.

Submittal of reports to MassDEP made in accordance with Regulation 310 CMR 7.00 (10) "*Recordkeeping and Reporting Requirements.*" of the Air Quality "*Operating Permit and Compliance Program*" shall satisfy the requirements of this provision. A separate set of reports is not required to satisfy the requirements of this Final Approval.

PERMIT DEVIATION

8. Interprint shall report to the MassDEP all instances of deviations¹ from permit requirements.

9. Interprint shall report to the MassDEP the following deviations from permit requirements, by telephone or fax, within three (3) days of discovery of such deviation:
 - Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
 - Exceedances of parameter limits established herein or in other approvals, where the parameter limit is identified by the permit or approval as surrogate for an emission limit.
 - Exceedances of permit operational limitations directly correlated to excess emissions.
 - Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, this Final Approval, or other approvals.
 - Failure to perform QA/QC measures as required by this Final Approval or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent compliance summary specified in Provision 7 of this Final Approval..

This report shall include the deviation, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone or fax within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned semi-annual compliance summaries.

¹ Deviations are instances where any permit condition is violated and not reported as an emergency as described in this Final Approval in the section "Emergency Conditions". Reporting a permit deviation is not an affirmative defense for action brought for noncompliance.

EMERGENCY CONDITIONS

10. Interprint shall be shielded from enforcement action brought for noncompliance with technology based² emission limitations specified herein as a result of an emergency³. In order to use emergency as an affirmative defense to an action brought for noncompliance, Interprint shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. an emergency occurred and that Interprint can identify the cause(s) of the emergency;
 - b. the permitted facility was at the time being properly operated;
 - c. during the period of the emergency, Interprint took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and
 - d. Interprint submitted notice of the emergency to the MassDEP within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response, immediate notification to the appropriate parties should be made as required by law.

² Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

³ An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

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 Final Approval may be suspended, modified, or revoked by MassDEP if, at anytime, MassDEP determines that any condition or part of this Final 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 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.

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 Final 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.