



Department of Environmental Protection

Central Regional Office • 627 Main Street, Worcester MA 01608 • 508-792-7650

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

RICHARD K. SULLIVAN JR.
Secretary

KENNETH L. KIMMELL
Commissioner

Date: January 18, 2012

Matthew Cavic
Rotation Dynamics Corporation
33 Hayes Memorial Drive
Marlborough, MA 01752

RE: Marlborough
Transmittal No.: X241120
Application No.: CE-11-029
Class: SM50
FMF No.: 322680
LPA PLAN APPROVAL

Dear Mr. Cavic:

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 operation of the roller covering operations at your manufacturing facility located at 33 Hayes Memorial Drive in Marlborough, 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 referenced Limited Plan Application ("LPA") is administratively complete and in conformance with the Air Pollution Control regulations and current air pollution control engineering practices 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.

MassDEP has determined that the filing of an Environmental Notification Form ("ENF") with the Secretary of Energy and 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 later.

1. FACILITY AND PROJECT DESCRIPTION

Rotation Dynamics or Rotadyne (the “Permittee”) is a continuation of an existing company that manufactures and rebuilds rubberized rollers used on printing presses and industrial machines. The company started operations at the present location in approximately 1968 under the name Ideal Roller & Graphics. The name of the company later changed to Rotadyne. The Permittee covers and recovers industrial rollers with rubber. In the process, cleaning solvents and solvent-containing adhesives are used, resulting in fugitive emissions of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). The VOC and HAP emissions are fugitive emissions to the room air indoors and are not vented from any particular exhaust stack. Examples of VOC/HAP containing materials include Thixon adhesive, hexane, methyl ethyl ketone, and isopropyl alcohol.

The Department issued an approval for cyclones and baghouses #CM-82-IF-029 dated November 20, 1982, which is **not** related to this Plan Approval, Application No. CE-11-029.

MassDEP inspected the facility in November 2011, when it was found the Permittee needed an Air Quality approval for VOC emissions over 1 ton per year. NON-CE-11-9031-5U7U was issued on December 5, 2011, requiring the Permittee to obtain a Limited Plan Approval (LPA) for the VOC emissions. In response, the present LPA was submitted on November 10, 2011.

MassDEP has determined that Best Available Control Technology (BACT) for this Plan Approval is Best Management Practices (BMPs) for VOC-solvent containing materials. BMPs include:

- Containers are closed except when in use,
- Safety push cans are used for dispensing solvents, and
- Workers are encouraged to use the least amount of these materials required to accomplish the task.

2. EMISSION UNIT IDENTIFICATION

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

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
1	Rubber Roller application	n/a	none

Table 1 Key:
 EU# = Emission Unit Number
 PCD = Pollution Control Device

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			
Emission, Operational & Production Limits			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
EU #1 (Facility Wide)	None	VOC	5 TPY and 1 TPM
	None	HAP (Single)	3 TPY and 0.5 TPM
	None	HAPs (Total)	3 TPY and 0.5 TPM

EU# = Emission Unit Number
 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 (rolling total)

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
1 (Facility Wide)	1. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	2. The Permittee shall conduct emission testing, in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13, for any MassDEP required stack emission testing.

Table 3 Key:
 EU# = Emission Unit Number

Table 4	
EU#	Record Keeping Requirements
1 (Facility-wide)	1. The Permittee shall keep monthly records of gallons purchased, emission factors and calculated pounds emitted on-site to demonstrate compliance with all emission limits contained in Table 2 above. 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. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	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) approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s). 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 of the approved EU(s). 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.
	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
1 (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 required by 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Central Regional Office of MassDEP, BWP C&E Chief by telephone [(508)767-2757,] email, [John.Kronopolus@state.ma.us] or fax [(508) 792-7621] 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.
	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.

4. SPECIAL CONDITIONS

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

- A. The Permittee shall track the use of all solvent-containing materials and shall calculate the resulting Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions at the end of each calendar month, providing both a monthly total and also a rolling twelve-month total each month.
- B. The Permittee shall restrict the use of solvent-containing materials as necessary to remain in compliance with the Table 2 limits on a monthly basis.
- C. The Permittee shall use Best Management Practices (BMPs) to reduce the emissions of VOC and HAP compounds from materials used in production. BMPs shall include the following:
 - Containers are closed except when in use,
 - Safety push cans are used for dispensing solvents, and
 - Workers are encouraged to use the least amount of these materials required to accomplish the task.

5. GENERAL CONDITIONS

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

- A. No person shall install or operate the equipment as noted in this plan application except in conformance with the requirements established in this Plan Approval. This Plan Approval is only for the equipment as noted within the application or as may otherwise be specified in the Plan Approval.
- B. 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).
- C. 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.
- D. 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.
- E. 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.
- F. 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.
- G. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- H. Failure by the Permittee to comply with any of the above stated conditions will constitute a violation of the 310 CMR 7.00 et seq, and subject the Permittee to enforcement action as provided by law.
- I. 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.
- J. 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.
- K. 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.
- L. All Plan Approvals issued under 310 CMR 7.02 prior to the date of this Plan Approval shall remain in effect unless specifically changed by this Plan Approval or superseded by this Plan Approval. The Facility shall not exceed the emission limits and comply with approved conditions specified in the applicable Plan Approval(s) unless specifically altered by this Plan Approval.
- M. 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.

- N. 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. APPEAL

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 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 02241

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.

Should you have any questions concerning this Plan Approval, please contact Paul Dwiggins at (508)767-2760.

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.

Roseanna E. Stanley
Acting Permit Section Chief,
Bureau of Waste Prevention

RES/PD

ecc: MassDEP/Boston - Yi Tian
Giles Steele-Perkins, MassDEP
Mike Elliott, RotaDyne Roll Group, 9126 Industrial Blvd., Covington, GA 3001