



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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October 7, 2015

Mr. Mark H. Woelfel
Alpha Analytical, Inc.
320 Forbes Boulevard
Mansfield, MA 02028

RE: Mansfield
Transmittal No.: X266705
Application No.: SE-15-018
Class: SM-25
FMF No.: 409478
AIR QUALITY PLAN APPROVAL

Dear Mr. Woelfel:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air & Waste, has reviewed your non-major Comprehensive Plan Application (“Application”) listed above. This Application concerns the proposed use of solvents and the combustion of natural gas at your analytical laboratory facility located at 320 Forbes Boulevard in Mansfield, Massachusetts (“Facility”). The Application bears the seal and signature of David M. Cotter, Massachusetts Registered Professional Engineer number 49068.

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 the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

Alpha Analytical Inc. (Alpha) operates an existing laboratory (“Facility”), which consists of a series of specialized analytical laboratories for the analysis of gaseous, liquid, soil, and solid environmental samples. In this application (SE-15-018), Alpha proposes a change to the operation of the existing laboratories, and establish federally enforceable operational limitations.

On June 10, 2014, MassDEP approved the Facility’s Application No. SE-13-032, to operate an existing laboratory with newly approved Pollution Control Devices (PCDs). Since then, the Permittee has performed extensive quality control/quality assurance testing for each of the federal and state analytical methods run on concentration units equipped with Solvent Vapor Recovery systems (SVR). The results of this testing indicate the SVR PCDs are capable of achieving a control efficiency of 95%. Currently the Permittee utilizes two types of SVR units; Water Bath Concentration Units with Solvent Vapor Recovery System (WB-SVR) and Vacuum Concentration Units with Solvent Vapor Recovery System (V-SVR). For the WB-SVR units, the sample is concentrated to a desired volume at which point the sample is transferred to a nitrogen blowdown (NB) unit to bring the sample to its final analytical volume. Based on their design, it is not technically feasible to install solvent vapor recovery systems on the NB units. The V-SVR units are capable of bringing samples down to their final analysis volume without use of NB units, but cannot be used for all sample analyses, as they have been demonstrated in use to have difficulty reaching the desired final solvent volume for certain solvents (such as hexane), and for certain types of samples (such as those containing analytes that interfere with solvent evaporation).

Analytical methods such as EPA method 8270 and PAH-SIM will be concentrated in the V-SVR. All other analytical methods will use the WB-SVR and NB units.

This Approval establishes new federally enforceable operational limitations for the use of the two types of SVR units and the NB units, and establishes federally enforceable operational limitations. MassDEP Air Quality Plan Approval SE-13-032 will be superseded with this Approval (SE-15-018).

Emission Unit #1 consists of a single laboratory room which includes the Organic Prep Laboratory (OPL), the Metals Prep Laboratory, the Wet Chemistry Laboratory, and glassware cleaning. In this single laboratory room, environmental samples are extracted using EPA (e.g. methods 8082 and 8270), MassDEP, and other state and federal agency analytical test methods. These methods use solvents including methylene chloride (a.k.a. “dichloromethane” or “DCM”), ethyl ether, acetone, pentane, or hexane, to extract the compounds for analysis from the environmental samples. The Metals Prep Laboratory does not use organic solvents. The emissions from glassware cleaning are calculated separately from SVR operations.

The Permittee operates external combustion sources, currently consisting of seven natural gas fired HVAC units. Each HVAC unit has a maximum heat input rate of less than 10 million Btu per hour (MMBtu/hr), and aggregate of all units <10 million British Thermal Units per hour. In

accordance with MassDEP Regulations at 310 CMR 7.02(2)(b)15.a., combustion sources with a maximum heat input of less than 10 MMBtu/hr per unit are not subject to (i.e. are exempt from) plan application filing and approval requirements.

The Permittee will also operate two natural gas fired emergency generators, each rated at 20 kilowatts and 30 kilowatts, which is not subject to the 37 kilowatt regulatory applicability threshold at 310 CMR 7.26(42). However, the Facility may be subject to the Federal New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines (40 CFR Part 60 Subpart JJJJ). Since MassDEP has not accepted delegation for Subpart JJJJ for non-major area sources, you are advised to consult with the United States Environmental Protection Agency (US EPA) for additional information. There may be additional notification, record keeping and reporting requirements. Their address is US EPA Region 1, 5 Post Office Square – Suite 100, Boston, MA 02109-3912.

The emissions from all fuel burning equipment, including the exempt units and the emergency generator, are quantified in this Plan Approval as part of the Facility-wide emission limits. Emissions from all fuel burning equipment are based on 8,760 hours of operation per year, with exception of the emissions from the emergency generator, which are based on 300 hours of operation per year.

The facility consists of three other laboratories: Volatile Organic Analysis, Semi-Volatile Organic Compound Instrumentation, and Metals Instrumentation. These laboratories do not use organic use solvents and are therefore not regulated in this Plan Approval.

Best Available Control Technology (BACT) for the OPL will be achieved through work practices and by using the WB-SVR and V-SVR to obtain the demonstrated collection efficiency of 100% and removal efficiency of 95% as contained in Table 2 of this Plan Approval.

BACT for glassware cleaning will be achieved by using work practices and glassware cleaning training in accordance with Table 6 of this Plan Approval by limiting evaporation loss to 10%.

Alpha has an obligation to maintain appropriate records and perform any necessary reporting as required by MassDEP Regulations at 310 CMR 7.02(2)(e) and (f) to maintain compliance with the respective exempt statuses. Emissions from the exempt activities are included in the Facility's emission totals.

MassDEP has reviewed the air quality dispersion modeling report that was included as part of Application SE-15-018. The AERMOD air quality dispersion modeling report demonstrates that the emission units, when operated in accordance with this Plan Approval, will not cause an exceedance of the AAL and TEL values for DCM currently in effect.

A ratio of the hexane to DCM emissions was calculated to estimate the modeling concentrations for hexane. Using this methodology and the proposed hexane emissions, the resulting concentrations demonstrate that the emission units, when operated in accordance with this Plan

Approval, will not cause an exceedance of the AAL and TEL values for hexane (alkanes/alkenes) currently in effect.

2. EMISSION UNIT (EU) 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	Organic Prep Laboratory (OPL) ¹	n/a	WB-SVR V-SVR Chiller

Table 1 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

OPL = Organic Prep Laboratory

WB-SVR = Water Bath Concentration Units with Solvent Vapor Recovery System

V-SVR = Vacuum Concentration Units with Solvent Vapor Recovery System

Note:

1. Includes the Metals Prep Laboratory, Wet Chemistry Lab, and glassware cleaning operations, all physically located within the OPL.

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					
EU#	Operational / Production Limit	Air Contaminant	Emission Limit		
1	1. \leq 4,323 liters of HAP (single) per month for sample processing and glassware cleaning operations combined (EU#1 total). 2. \leq 21,616 liters of HAP (single) per consecutive 12-month period for sample processing and glassware cleaning operations combined (EU#1 total). 3. \leq 965 liters of HAP (single) per month for glassware cleaning operations only. ⁴ 4. \leq 4,827 liters of HAP (single) per consecutive 12-month period for glassware washing operations only. ⁴ 5. \leq 4,942 liters of HAPs (total) per month. 6. \leq 24,710 liters of HAPs (total) per consecutive 12-month period. 7. \leq 673 liters of VOC per month. 8. \leq 3,363 liters of VOC per consecutive 12-month period. 9. \leq 614 liters of acetone per month. 10. \leq 3,068 liters of acetone per consecutive 12-month period. 11. SVR collection efficiency = 100%. ² 12. SVR removal efficiency \geq 95%. ² 13. Water chiller temperature maintained \geq 0 and \leq 25°C.	HAP (single) ¹	0.43 TPM		
		(EU#1 total)	2.14 TPY		
		HAPs (total)	0.46 TPM		
			2.30 TPY		
		VOC	0.04 TPM		
			0.18 TPY		
		Acetone	0.05 TPM		
			0.27 TPY		
		Facility-wide ³	14. Hours of emergency engine operation \leq 300 hours per engine per consecutive 12-month period.	Opacity	0%
				HAP (single) ¹	2.14 TPY
				HAPs (total)	2.34 TPY
				VOC	0.29 TPY
				PM	0.13 TPY
CO	1.52 TPY				
NO _x	2.21 TPY				
Acetone	0.27 TPY				

Table 2 Key:

- EU# = Emission Unit Number
- CO = Carbon Monoxide
- DCM = methylene chloride
- HAP = Hazardous Air Pollutant
- HAP (single) = maximum single Hazardous Air Pollutant
- HAPs (total) = total Hazardous Air Pollutants
- HVAC = Heating, Ventilation, and Air Conditioning
- NO_x = Nitrogen Oxides
- PM = Total Particulate Matter
- SVR = Concentration units equipped with Solvent Vapor Recovery systems
- TPM = tons per month
- TPY = tons per consecutive 12-month period
- VOC = Volatile Organic Compounds
- \geq = Greater than or equal to

≤ = Equal to or less than
 % = percent
 °C = degrees Centigrade

Notes:

1. The single largest HAP is DCM.
2. Applies to HAP (single), HAPs (total), VOC, and acetone air contaminants.
3. Facility-wide HAP and VOC limits include all fuel combustion operations. Natural gas shall be the exclusive fuel of use. HVAC emission calculations based on 8,760 hours of operation per consecutive 12-month period. Emergency generator emission calculations based on 300 hours of operation per consecutive 12-month period.
4. Glassware cleaning operation emission calculations based on a 10% evaporative loss factor.

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	<ol style="list-style-type: none"> 1. The Permittee shall perform solvent recovery testing on each SVR Pollution Control Device once per calendar month to demonstrate compliance with the removal efficiency contained in Table 2 of this Plan Approval. The Permittee shall conduct the solvent recovery test in accordance with the Standard Operating Procedures contained in Section 7 of the Approved Application. After one year, the Permittee may propose a reduction of the test frequency after consulting with MassDEP. 2. The Permittee shall monitor the temperature of the refrigerated recirculating chiller solution at all times while solvent recovery operations are being conducted to demonstrate compliance with the operational limit contained in Table 2 of this Plan Approval. 3. The Permittee shall continuously monitor the refrigerated recirculating chiller to ensure it pumps fluid at all times while solvent recovery operations are being conducted. 4. The Permittee shall monitor material usage and record the number of samples analyzed such that compliance with the operational, production, and emission limits contained in Table 2 of this Plan Approval can be determined.
Facility-wide	<ol style="list-style-type: none"> 5. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration. 6. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13.

Table 3 Key:

EU# = Emission Unit Number
 SVR = Concentration units equipped with Solvent Vapor Recovery system
 USEPA = United States Environmental Protection Agency
 MassDEP = Massachusetts Department of Environmental Protection
 CMR = Code of Massachusetts Regulations

Table 4	
EU#	Record Keeping Requirements
1	1. The Permittee shall maintain records for solvent recovery testing as required by Table 3.
Facility-wide	2. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and 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 .
	3. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	4. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) and PCD(s) approved herein on-site.
	5. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. 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.
	6. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	7. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	8. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	9. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.
	10. The Permittee shall maintain training records for glassware cleaning using DCM, conducted as required by Table 6 of this Plan Approval.

Table 4 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

SOMP = Standard Operating and Maintenance Procedure

USEPA = United States Environmental Protection Agency

MassDEP = Massachusetts Department of Environmental Protection

CMR = Code of Massachusetts Regulations

DCM = methylene chloride

Table 5	
EU#	Reporting Requirements
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 as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Southeast Regional Office of MassDEP, BAW Permit Chief by telephone 508-946-2824, email sero.air@state.ma.us or fax: (508) 946-2865 or (508) 947-6557, as soon as possible, but no later than three (3) business days after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to BAW Permit Chief at MassDEP within ten (10) 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 every three years 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. This Proviso does not apply to the solvent recovery testing described in Proviso 1. as contained in Table 3 of this Plan Approval. This Proviso is associated with Proviso 6. as contained in Table 3 of this Plan Approval.
	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. This Proviso does not apply to the solvent recovery testing described in Proviso 1. as contained in Table 3 of this Plan Approval. This Proviso is associated with Proviso 6. as contained in Table 3 of this Plan Approval.

Table 5 Key:

EU# = Emission Unit Number

BAW = Bureau of Air and Waste

MassDEP = Massachusetts Department of Environmental Protection

4. SPECIAL TERMS AND CONDITIONS

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

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
1	<p>1. The Permittee shall ensure that the appropriate PCDs approved herein (WB-SVR, V-SVR and chillers) are operating at all times when sample extraction operations are being performed in association with Proviso 3 in Table 6 of this Plan Approval.</p> <p>2. The Permittee shall not install and/or operate more than 10 SVR PCDs and 4 NB units at any one time.</p> <p>3. The Permittee shall conduct EPA method 8270 and PAH-SIM analyses in the V-SVR units. The Permittee shall concentrate all other analytical samples in the WB-SVR and NB units (in sequence) or in the V-SVR units.</p> <p>4. The Permittee shall comply with the following work practices:</p> <ul style="list-style-type: none"> a. Use solvent containers that minimize solvent losses. b. Use solvent containers that avoid excessive transferring or pouring of solvents. c. Conduct glassware cleaning training (using DCM) for all existing laboratory personnel within 60 days and within 30 days for new laboratory personnel using the training outline contained in Section 7 of the Application. d. Use washing techniques which do not require the use of solvent containing material when possible, such as soap solutions and oven baking. e. Use fine tip squirt bottles when applying solvent-containing materials to the glassware to control the amount of material used. f. Store all solvent-containing materials in closed containers. g. Keep all containers of solvent-containing materials closed at all times except when materials are being deposited or removed from the container. h. Use enclosed funnels on receiving vessels for solvent-containing materials.
Facility-wide	<p>5. This Plan Approval, Transmittal No. X266705, supersedes Air Quality Plan Approval, Transmittal No. X256551, corrected/issued to the Permittee on June 10, 2014, in its entirety, with the exception that all plan application materials submitted as part of the Plan Approval Transmittal No. X256551 become part of this Plan Approval, Transmittal No. X266705.</p>

Table 6 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

WB-SVR = Water Bath Concentration Units with Solvent Vapor Recovery System

V-SVR = Vacuum Concentration Units with Solvent Vapor Recovery System

NB = Nitrogen Blowdown concentration unit

DCM = Methylene Chloride

EPA = Environmental Protection Agency

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1 (EF-8)	50	1	77.8	75
1 (EF-10)	50	0.67	72.8	75

Table 7 Key:

EU# = Emission Unit Number

EF = Exhaust Fan

°F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee 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, 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).
- 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. Should there be 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. 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.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Dan Kamieniecki by telephone at 508-946-2717 or in writing at the MassDEP's Southeast Regional Office.

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.

Thomas Cushing
Permit Chief, Southeast Region
Bureau of Air & Waste

Enclosure

cc: Mansfield Board of Health
Mansfield Fire Department
MassDEP/Boston – Y. Tian
MassDEP/SERO – M. Pinaud
MassDEP/SERO – L. Ramos
TRC Environmental Corporation – M. Jones, A. McVey