



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

June 2, 2015

Mr. George Jones III
Seaman Paper Company
51 Main Street
Otter River, MA 01436

RE: Otter River
Transmittal No.: **W211007-A1**
Class: OP
FMF No.: 133373
AIR QUALITY PLAN APPROVAL

Dear Mr. Jones:

The Department of Environmental Protection, Bureau of Air and Waste, Permitting Section ("MassDEP") has reviewed its records and is issuing this administrative amendment to Plan Approval Transmittal Number W211007, originally issued April 30, 2008. The purpose of this amendment is to change several conditions of Plan Approval Transmittal Number W211007 which had been previously altered by MassDEP, but had not been formally incorporated into the Plan Approval. The changes are discussed in detail in Section II, Project Description.

This non-major comprehensive Plan Application Transmittal Number W211007 was for the installation and operation of a new wood fired boiler, associated operations and modifications of the existing fuel utilization facility at Seaman Paper Company, 51 Main Street, Otter River, Massachusetts as submitted under the seal and signature of Stephen Babcock P.E. Number 39761.

MassDEP is of the opinion that the material submitted is in conformance with the current Massachusetts Air Pollution Control Regulations and hereby approves the project subject to the conditions and provisions stated herein. This approval is limited to the applicable air pollution control regulations and does not constitute approval as may be required by other MassDEP Regulations or Statutes in order for the above-mentioned facility to be installed and operated. This approval provides information on the project description, emission limitations, restrictions, specific conditions, record keeping, reporting and testing requirements.

This Amended Approval Transmittal Number W211007-A1 replaces in its entirety Plan Approval Transmittal Number W211007 dated April 30, 2008.

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

Printed on Recycled Paper

I. HISTORY

A. Seaman Paper is a non-integrated paper mill producing lightweight specialty papers on two Fourdrinier paper machines. The products include wrapping tissue, wax-coated bakery tissues, decorative crepe paper and flat tissue specialties. The facility is located off Main Street along the bank of the Otter River in Templeton, Massachusetts. Raw materials used by the facility consist of water, virgin paper fiber and recycled paper fiber. Three on-site boilers presently provide for the thermal demands of the facility. Two boilers are fired by No.6 oil with a sulfur content not in excess of 1.0 percent by weight and one boiler with wood biomass fuel. The facility has an overall steam limit of 1,209,6000 pounds of steam per calendar day.

B. There are two (2) 15,000-gallon underground storage tanks which are used for fuel oil storage. The other combustion units include a 35 kW and a 70 kW standby generator. The standby generators provide limited power for emergency lighting in the absence of utility power and the ability to run a boiler in the event of prolonged winter power outages to prevent freezing. The generators are fired by propane.

C. MassDEP previously issued Air Pollution Control Plan approvals to the paper manufacturing facility as noted below.

<u>Project</u>	<u>Plan Application</u>	<u>Date Approved</u>
Proposed Boiler Replacement	#CM-79-C-028	November 15, 1979
Proposed Combination Wood/Oil Fired Boiler	#CM-81-C-049	December 23, 1981
Proposed Boiler	#CM-87-C-004	February 18, 1987
Burner Replacement	#CM-88-C-002	January 21, 1988
Permit For Three Boilers	#C-B-90-011	May 9, 1990
Final Operating Permit	Tr.# 118031	May 18, 1999
Plan of Good Operating Practices		October 8, 2004
Permit Restriction for Three Boilers	#C-B-90-011	November 3, 2004
New wood fired boiler	Tr# W064868	October 25, 2005
New wood fired boiler (Amended)	Tr# W064868-A	August 20, 2007
Second wood fired boiler	Tr# W211007	April 30, 2008

II. PROJECT DESCRIPTION

A. The Permittee is proposing to install a second new wood fired boiler at its existing specialty paper making facility in the Otter River Section of Templeton, Massachusetts. The new boiler will be fired with “wood fuel.” Other biomass fuels may be proposed for use at the facility in the future and this plan approval does not prohibit the Permittee from applying for such use. The new wood fired boiler, referred to herein as Emission Unit (“EU”) # 5 will provide process steam augmented by existing boilers, EU #2, EU #3 which burn fuel oil and EU #4 which burns wood fuel. At the time that EU #4 was installed, an existing boiler identified as EU #1, which burned fuel oil, was removed from the facility. EU #5 will be located adjacent to EU #4 in an existing building extension in the southern area of the main mill building.

B. EU #4 and EU #5 are designed as fire tube and water tube boiler with advanced combustion technology that gasifies the wood fuel prior to combustion. EU #5 may operate by itself or in conjunction with EU #2, EU #3 and EU #4 to provide facility steam needs. The changes at the facility will include incorporation of a steam turbine generator to produce approximately 300kW of electrical power for the facility. The steam turbine will utilize backpressure steam and therefore, no additional steam beyond the facility’s existing steam load will be required. No changes are being proposed for

operation of EU #2 and EU #3 and they may continue to operate in compliance with this and other applicable plan approvals and with or without EU #4 and EU #5 to meet facility steam needs.

C. Fuel handling for EU #4 and EU #5 incorporates existing equipment at the facility. The equipment includes a wood fuel receiving area and wood fuel storage silo. No modifications to the wood fuel handling facilities will be required because of the installation of EU #5.

D. Wood fuel in the form of wood chips arrives by truck in enclosed trailers. The truck and trailer is weighed on a truck scale. The trailer is then backed onto a rader truck dump, the trailer is detached and the truck pulls forward. The trailer is then raised on a platform by hydraulic pistons and the wood chips discharge into a hopper. The wood chips are metered out of the hopper by a drag chain onto a conveyer. The conveyer transports the chips to a disc screen where oversize chips are rejected. Oversized chips are reground in a hammer mill for reintroduction into the system.

E. A magnet is used to sort out any wood chips that contain metal. Accepted wood chips discharge into a bucket elevator that transports them into the top of a Laidig silo (30' diameter, 64' high, approximately 300 ton capacity). A screw augur transports wood chips out of the silo to a surge bin ahead of the boilers. The truck reconnects to the trailer after unloading and the truck and trailer combination is weighed again. The difference in weights is recorded as the quantity of wood chips received.

F. EU #4 and EU #5 are identical boilers and each boiler will be equipped with its own pollution control system. The pollution control systems will be identical as well. [a Staclean unit](#)

1. Particulate Matter ("PM") will be controlled by a primary and secondary control device. The primary control device shall consist of a dry mechanical dust collector (dry multiclone), manufactured by Filter Technology or equivalent to remove the large coarse particles from the gas stream prior to entering the dry air filter system. The dry multiclone consists of one module with 96 tubes. The unit will operate at a pressure drop of 4 inches of water with an overall collection efficiency of 85%. The particulates captured will be removed on a continuous basis through the rotary air lock valves and transferred to a discharge conveyor system.
2. The secondary control device shall be a fabric filter collection system. The fabric filter shall be designed and installed to meet the emission limits noted in this plan approval. The unit shall be sized and designed to handle up to 17,000 ACFM with a pressure drop not to exceed 6 inches of water with an overall collection efficiency of +99% and a stated emission rate not to exceed 0.3 pounds per hour while operating at 100% rated capacity. The bags will be cleaned as determined by the pressure drop gauge and scheduled maintenance. The fabric filter currently proposed is a positive air filter system manufactured by Filter Technology, model #132-10TRWI-4 with 528 woven Teflon coated fiberglass tubes (528 represents 4 modules each with 132 bags) providing a bag surface area of 8,352 square feet providing an air to cloth ratio of approximately 1.9 to 1. If a different make or model is chosen to substitute for the Filter Technology model #132 the Permittee shall provide MassDEP Central Region, BAW, Permit Section with an update complete set of appropriate design data forms, standard operating and standard maintenance procedures for the equivalent fabric filter collector.
3. Oxides of Nitrogen ("NOx") will be controlled by flue gas recirculation. Flue gas recirculation (FGR) involves removing a percentage of the flue gas out of the gas stream and introducing the

flue gas into the burner to lower the flame temperature while reducing the formation of Oxides of Nitrogen. Each boiler will have its own FGR system.

G. The Emission Units at the facility are noted in Table 1.

Table 1-Emission Units					
Emission Unit #	Description	Make & Model	Design Capacity (MMBtu/hr) ¹	Fuel	Pollution Control Device
EU #2	High pressure water tube boiler	Bigelow Type A	49.5	#6 residual fuel oil	Combustion Controls
EU #3	High pressure water tube boiler	B&W FM - 370	32.5		
EU #4	High pressure water tube boiler	Hurst Boiler Super 600	29.88	Wood	Combustion Controls, Flue Gas Recirculation, Fabric Filter Collector
EU #5	High pressure water tube boiler	Hurst Boiler Super 600	29.88	Wood	Combustion Controls, Flue Gas Recirculation, Fabric Filter Collector

¹ MMBtu/hr = Millions of British Thermal Units per hour

The operation of EU #2, EU #3, EU #4 and EU #5 will result in emissions to the ambient air of Particulate Matter (PM), Sulfur Dioxide (SO₂), Nitrogen Oxides (NO_x), Carbon Monoxide (CO) and Volatile Organic Compounds (VOC's).

H. In response to a letter from the Permittee dated June 19, 2014, MassDEP reviewed its records and found that the following changes need to be made in Plan Approval Transmittal Number W211007:

1. Condition V.B. contained a restriction on the boilers of 50,000 pounds per hour of steam. That condition is now removed, consistent with MassDEP's letter dated November 3, 2004, which removed the same restriction from the boiler Plan Approval Number C-B-90-011.
2. On October 8, 2008, MassDEP issued an approval for a Plan of Good Operating Practices for opacity from EU #2 and EU #3 in accordance with 310 CMR 7.06(1)(c). This Plan of Good Operating Practices is now incorporated by reference into Table 2 for EU #2 and EU #3.
3. Condition VII. G. stated, "The Permittee shall test EU #4 and EU #5 for NO_x, CO and VOC annually. After initial compliance testing, the Permittee may propose an alternative method of monitoring for NO_x, CO and VOC in lieu of an annual test."
 - a. On October 22, 2008, the Permittee proposed that future annual compliance testing be performed on a certified portable ECOM analyzer for NO_x, CO and SO₂.
 - b. MassDEP issued a letter approving the proposed annual compliance testing with a certified portable ECOM analyzer for NO_x, CO and SO₂ on October 27, 2008.
 - c. On May 23, 2014, another request was submitted to further modify the annual compliance testing with a certified portable ECOM analyzer for NO_x, CO and SO₂, instead of NO_x, CO and VOC. There is no reliable portable VOC testing instrument available, and the VOC stack testing conducted in June and July 2009 did demonstrate that the VOC emission was well below the emission limit of 0.9 lb/hr. Therefore annual

VOC testing was no longer required. Annual compliance testing with a certified portable ECOM analyzer for NO_x, CO and SO₂ is here incorporated into Table 5.

4. On February 19, 2015, the Permittee agreed to a facility wide sulfur dioxide emission limit of 145 ton per year, in compliance with state wide sulfur content reduction for residual oil from 1.0% to 0.5%, effective July 1, 2018. This limit is now incorporated into Table 3 for EU #2, EU #3 and facility wide.

III. EMISSION LIMITS

A. The Permittee shall install and operate EU #2, EU #3, EU #4 and EU #5 in a manner that ensures continuous compliance with the emission limits noted in Table 2 and 3.

IV. RESTRICTIONS

A. Residual fuel oil burned at the facility shall have a sulfur content not to exceed 0.55 pounds per million Btu (equivalent to 1.0% by weight). Distillate fuel oil burned at the facility shall have a sulfur content not to exceed 0.0275 pounds per million Btu. (equivalent to 0.05% by weight).

B. The Permittee shall ensure that the combined steam output of the four boilers (EU #2, EU #3, EU #4 and EU #5) will not exceed 1,209,600 pounds of steam per 24 hour rolling total period.

C. Combined heat input into the four boilers shall not exceed 63,000,000 Btu per hour.

D. Emissions shall not exceed the emission limits noted in Table 2 & Table 3.

Table 2 – Short Term Emission Limits¹					
Pollutant	EU#2	EU#3	EU#2 & EU#3 Combined	EU#4	EU#5
PM ₁₀	0.10 lbs/MMBtu & 4.95 lbs/hr	0.10 lbs/MMBtu & 3.25 lbs/hr	6.3 lbs/hr	0.01 lbs/MMBtu & 0.30 lbs/hr	0.01 lbs/MMBtu & 0.30 lbs/hr
SO ₂	1.05 lbs/MMBtu & 51.9 lbs/hr	1.05 lbs/MMBtu & 34.1 lbs/hr	65.9 lbs/hr	0.03 lbs/MMBtu & 0.90 lbs/hr	0.03 lbs/MMBtu & 0.90 lbs/hr
NO _x	0.37 lbs/MMBtu & 18.3 lbs/hr	0.37 lbs/MMBtu & 12.0 lbs/hr	23.1 lbs/hr	0.22 lbs/MMBtu & 6.6 lbs/hr	0.22 lbs/MMBtu & 6.6 lbs/hr
CO	0.03 lbs/MMBtu & 1.48 lbs/hr	0.03 lbs/MMBtu & 0.97 lbs/hr	2.1 lbs/hr	0.45 lbs/MMBtu & 13.5 lbs/hr	0.45 lbs/MMBtu & 13.5 lbs/hr
VOC	0.002 lbs/MMBtu & 0.10 lbs/hr	0.002 lbs/MMBtu & 0.06 lbs/hr	0.12 lbs/hr	0.03 lbs/MMBtu & 0.90 lbs/hr	0.03 lbs/MMBtu & 0.90 lbs/hr
Opacity	Comply with 310 CMR 7.06(1)(c), in accordance with the approved Plan of Good Operating Practices dated October 8, 2004			1. During all modes of operation except start-up, shut down and soot blowing the opacity shall not exceed 5% at any time. 2. During start-up, shut down and soot blowing operations the opacity shall not exceed 20% for a period of two minutes in any one hour period and shall not exceed 40% at any time.	

¹ lbs/MMBtu and lbs/hour emission limits are based upon one hour block averages.

lbs/MMBtu = pounds per million British Thermal Units
 PM₁₀ = Particulate Matter greater than 10 microns in diameter.

Table 3 – Emission Limits in Tons per 12 month Rolling Total					
Pollutant	EU #2	EU #3	EU #4	EU #5	EU #2, EU #3, EU #4 & EU #5 (Combined) ¹
PM ₁₀	21.7	14.2	1.3	1.3	27.6
SO ₂	145.0	145.0	3.9	3.9	145.0
NO _x	80.2	52.6	28.9	28.9	102.1
CO	6.5	4.3	58.9	58.9	118.2
VOC	0.4	0.3	3.9	3.9	7.9

¹Based upon maximum pounds per hour of emissions, 8760 hours per year and at a combined heat input rate of 63 million British thermal units per hour (MMBtu/hr) for any combination of boiler operations.

V. SPECIAL CONDITIONS

A. The emissions from EU #2 and EU #3 will be emitted through a common steel exhaust stack ("Stack #1"). The emissions from EU #4 and EU #5 shall be emitted through a common steel exhaust stack ("Stack #2"). Specifications on the exhaust stacks are presented in Table 4.

Table 4 –Stack Requirements						
Emission Unit	Stack Number	Stack Material	Stack Diameter	Stack Exit Height	Stack Exit Velocity	Stack Exit Temperature
EU #2 & EU #3	#1	Steel	4.5 feet	140 feet above ground	40 feet per second	425-550°F
EU #4 & EU #5	#2	Steel	4.0 feet	100 feet above ground	33 feet per second	325-425°F

B. The Permittee shall only burn wood fuel in EU #4 and EU #5 at this time. The Permittee is not precluded from requesting written approval to burn other biomass materials at a future date. Such request shall be made in writing to MassDEP. Depending on the nature of the request a plan application in accordance with the air pollution control regulations at 310 CMR 7.02 may or may not be required.

C. The Permittee shall only burn "wood-fuel" that meets the definition in the Air Pollution Control Regulations at 310 CMR 7.00. The noted definition states "Wood-Fuel means all wood intended to be used as a fuel included but not limited to trees, cord wood, logs, lumber, sawdust, and wood from manufacturing processes (but offs, shavings, turnings, sawdust, etc.), wood pallets, slabs, bark, chips, waste pallets, boxes, etc. This definition does not include materials, which are chemically treated with any preservative, paint, or oil." Please note that it does not include wood waste derived from Construction and Demolition debris. Any deviation from the wood fuel noted herein will require the Permittee to submit additional information for evaluation by DEP. Written approval from MassDEP is required prior to use of wood fuel that does not conform to the definition noted herein or the air pollution control regulations.

D. The Permittee shall ensure that the delivery of any wood fuel shall be done in covered leak proof trailers.

E. Boiler bottom ash will be discharged into a rolling container inside the boiler house. The fly ash drops through double gate valves from the fabric filter into barrels.

F. The Permittee shall develop and implement a plan to monitor the ash collection system. The Permittee shall take appropriate action to prevent at all times, the release to the ambient air of visible emissions that exceed 0% opacity because of the handling of the ash. Ash that may be spilled on the ground shall be promptly removed in a manner that does not cause a condition of air pollution.

G. In accordance with MassDEP Noise Policy 90-001, the Permittee shall not allow the facility to produce an increase in sound by more than 10dBA over the existing L90 ambient level (1-hour A-weighted), unless otherwise specified. Additionally, pure tone sounds, defined, as any octave band level, which exceeds the levels in adjacent octave bands by 3dBA or more, is prohibited.

H. The Permittee shall install and have operational noise suppressants (muffler) on all steam release vents so that sound emissions from EU #4 and EU #5 will not cause or contribute to a condition of air pollution.

VI. TESTING REQUIREMENTS

A. **EMISSION COMPLIANCE TESTING** - the Permittee shall conduct compliance testing of EU# 5 within 180 days of start up of the emission unit or at a later time as may be approved in writing by MassDEP. The following pollutants shall be tested for compliance with the emission limits contained in this plan approval: Particulate Matter, Sulfur Dioxide, Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds and Opacity.

B. **TESTING PROCEDURES** - Emission Testing to demonstrate compliance with the Emission Limits specified shall be in accordance with EPA approved reference test methods unless otherwise approved by EPA or MassDEP. The facility will be constructed to accommodate emission-testing requirements contained herein. All emission testing shall be conducted in accordance with MassDEP's "Guidelines for Source Emission Testing" and in accordance with the Environmental Protection Agency tests as specified in the Code of Federal Regulations Title 40, Part 60, Appendix A...Standards of Performance for New Stationary Sources of Air Pollution.

C. **FUEL SUPPLY TESTING** - During emission testing, the Permittee, under MassDEP's observations, shall obtain five random grab samples of wood fuel from the fuel stream and send the samples to a laboratory acceptable to MassDEP. The wood fuel shall be analyzed for the presence of contaminants inconsistent with the wood fuel definition, including but not limited to such materials as oils, paint, metals, plastics, or other foreign materials other than wood. Btu value, moisture content and Sulfur content shall also be tested. The Permittee is responsible for all laboratory expenses.

D. **PRETEST PROTOCOL** - The Permittee shall submit a pre-test protocol, describing the test methods for the emissions testing and fuel supply testing. The protocol shall also include the sampling point locations, sampling equipment and sampling and analytical procedures as well as expected boiler operating conditions during the testing. The Permittee shall also propose a parametric monitoring strategy to ensure continuous compliance with the emission limitations specified in this approval. The required testing must be submitted to this Office, attention Bureau of Air and Waste Section Chief, for review and MassDEP approval at least thirty ("30") days prior to the commencement of emission testing at the facility.

E. **FINAL REPORT** - The final test report must be submitted within sixty ("60") days of completion to MassDEP, Bureau of Air and Waste, Permitting Section, 8 New Bond Street, Worcester, Massachusetts, 01606.

F. **BLACK LIGHT TESTING** - The Permittee shall conduct a black light test on the fabric filter collector serving EU #4 and EU #5 on a quarterly basis in order to evaluate the condition of the baghouse.

G. **NO_x, CO and SO₂ TESTING** - The Permittee shall test EU #4 and EU #5 for NO_x, CO and SO₂ annually with a certified portable ECOM analyzer. The ECOM analyzer shall be maintained in correct working order by routine calibration per manufacturer's recommendations.

H. **GENERAL REQUIREMENTS for EMISSION TESTING** – In accordance with 310 CMR 7.13, MassDEP may require testing of any pollutants if deemed necessary to ascertain the mass emission rates and relationship to equipment design and operation. The Permittee shall conduct stack testing when MassDEP has determined that such stack testing is necessary to ascertain compliance with MassDEP's regulations or design approval provisions. Such stack testing shall be:

1. Conducted by a person knowledgeable in stack testing, and
2. Conducted in accordance with the procedures contained in a test protocol, which has been approved in writing by MassDEP, and
3. In the presence of a representative of MassDEP when such is deemed necessary in accordance with 310 CMR 7.13(1).

VII. MONITORING REQUIREMENTS

A. The Permittee shall install, calibrate and maintain a smoke density indicator and recorder equipped with an audible alarm to measure opacity on EU #4 and EU #5.

B. Equipment or emission monitoring systems installed for the purpose of documenting compliance with this approval shall be installed, calibrated, maintained and operated by the Permittee in sufficient manner to ensure continuous and accurate operations at all times. The Permittee shall monitor the

operations of the entire facility such that necessary information is available for the preparation of the Source Registration/Emission Statement Forms as required by 310 CMR 7.12.

C. INSPECTION AND MAINTENANCE - In accordance with 310 CMR 7.04(4)(a), each emission unit shall be inspected and maintained in accordance with the manufacturer's recommendations and tested for efficient operation at least once in each calendar year. The results of said inspection, maintenance and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near the permitted equipment.

D. The Permittee shall equip EU #2, EU #3, EU #4 and EU #5 with a steam flow meter(s) and recorder(s) sufficient to demonstrate compliance with the steam production limitations noted in this plan approval.

E. The Permittee shall perform monitoring and testing as noted in Table 5. This monitoring and testing information shall be considered when evaluating compliance with the terms and conditions of this plan approval.

Table 5 – Monitoring & Testing		
Pollutant	Frequency	Monitoring & Testing Requirements
PM ₁₀	Quarterly	Perform a fluorescent black light test on EU #4 and EU #5 fabric filter collector.
	Daily	1. Opacity Indicator and Recorder 2. Pressure drop across EU #4 and EU #5 fabric filter collector
SO ₂	Annual & upon any change in fuel stock or supplier	Sample Wood Fuel for sulfur content
NO _x	Annual	Conduct Emission Compliance Test with portable ECOM analyzer and FGR percent damper open
CO	Annual	Conduct Emission Compliance Test with portable ECOM analyzer
SO ₂	Annual	Conduct Emission Compliance Test with portable ECOM analyzer

VIII. RECORD KEEPING REQUIREMENTS

A. The Permittee shall maintain an on-site record keeping system for each of the emission units. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination. The Permittee shall keep records for five years. The record keeping requirements apply to EU #2, EU #3, EU #4 and EU #5. Record keeping shall include, at a minimum:

1. Manufacturer recommended operating and maintenance procedures,
2. Operating and Maintenance log books. These log books shall contain the following information on a daily basis:
 - a) Date and hours of operation of the boilers

- b) Date, time and description of any maintenance performed on the boilers, monitoring systems, breeching or stack.
 - c) Smoke recorder charts
 3. Fuel inventory that shows the total amount of wood-fuel and oil delivered on a monthly basis and 12 month rolling total.
 4. Name of Company delivering the wood-fuel and oil including as a minimum, date of delivery, amount of tons/gallons, sulfur content of fuel oil and truck ID number.
- B. The Permittee shall maintain steam flow charts for the fuel utilization facility to demonstrate compliance with the facility wide steam load limitations.
- C. The Permittee shall maintain sufficient records of operation and monitoring information for the preparation of a Source Registration/Emission Statement form as may be required by 310 CMR 7.12 (3).
- D. The Permittee shall maintain fluorescent black light test results from the bag house and routine maintenance. Upon completion of any fluorescent black light test, facility personnel shall maintain the following records:
1. The date the test was performed,
 2. Name of person or consultant performing the test,
 3. List any deficiencies on the bag house operational parameters and test results.

IX. REPORTING REQUIREMENTS

- A. **REGISTRATION** - As required by 310 CMR 7.12(2), the facility shall register on a form obtained from MassDEP such information as MassDEP may specify including the nature and amounts of emissions from the facility, information which may be needed to determine the nature and amounts of emissions from the facility, any other information pertaining to the facility which MassDEP requires.
- B. **UPSETS AND MALFUNCTIONS** - The Regional Bureau of Air and Waste, Compliance and Enforcement Section, must be notified by telephone or fax as soon as possible and in writing within three business days after the occurrence of any UPSETS or MALFUNCTIONS to the facility equipment, air pollution control equipment, or monitoring equipment which result in an excess emission to the ambient air (in violation of permitted emission level) and/or a condition of air pollution.
- C. **ON REQUEST** - Upon written request from MassDEP the Permittee shall submit such records as may be determined by MassDEP to be necessary to ascertain compliance with the provisions of this approval. Said information shall be submitted to MassDEP within thirty ("30") days of the request or within a longer time period as indicated in writing by MassDEP. Said response shall be transmitted on paper, on computer disk, or electronically at the discretion of MassDEP.

X. GENERAL CONDITIONS

- A. Should there be any differences between the data submitted in Plan Application Tr#W211007 and this approval letter, this approval shall govern.

- B. OPERATION - No person shall operate this facility except in conformance with the requirements established in this Approval.
- C. SUSPENSION - This approval may be suspended, modified, or revoked by MassDEP if, at any time, MassDEP determines that the facility is violating any condition or part of the approval.
- D. OTHER REGULATIONS - This approval does not negate the responsibility of the owner/operator 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.
- E. EXISTING APPROVALS - Unless otherwise indicated in this approval, all plan approvals issued under 310 CMR 7.02(2) prior to the effective date of this Approval shall continue to be in effect. The facility shall meet the emission rates and approved conditions specified in the applicable plan approval(s) unless specifically altered by this Approval.
- F. DUST AND ODOR - The facility shall be operated in a manner to prevent the occurrence of dust or odor conditions which cause or contribute to a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.09.
- G. ASBESTOS - Should asbestos remediation/removal be required as a result of this Approval, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15.
- H. MODIFICATIONS - Any proposed increase in emissions above the limits contained in this Approval must first be approved in writing by MassDEP pursuant to 310 CMR 7.02. In addition, any increase may subject the facility to additional regulatory requirements.
- I. REMOVAL OF AIR POLLUTION CONTROL EQUIPMENT - No person shall cause, suffer, allow, or permit the removal, alteration or shall otherwise render inoperative any air pollution control equipment or equipment used to monitor emissions which has been installed as a requirement of 310 CMR 7.00, other than for reasonable maintenance periods or unexpected and unavoidable failure of the equipment, provided that MassDEP has been notified of such failure, or in accordance with specific written approval of MassDEP.

XI. LIST OF PERTINENT INFORMATION, TRANSMITTAL # W211007

Name of Facility: Seaman Paper Company

Location: 51 Main Street, Otter River, Massachusetts

Submitted By: EBI Consulting, Attested To By: Steven Babcock, P.E. Number 39761

- 1) Two Non-Major Comprehensive Plan Applications, Date Received: March 3, 2008
- 2) Supplemental forms for Fabric Filter Collector, Dated February 28, 2008
- 3) Letter dated May 23, 2014 to request annual emission testing with portable ECOM analyzer for NO_x, CO and SO₂.
- 3) Letter dated February 19, 2015 to limit facility wide sulfur dioxide emission of 145 ton per year.

XII. APPEAL

This Decision 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 Decision. 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 Decision 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 MassDEP 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 for the facts believed to support the claim of undue financial hardship.

Yours truly,

*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
Permit Chief
Bureau of Air and Waste

ecc: MassDEP/Boston - Yi Tian