



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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Date: August 12, 2015

Mr. Jeffrey Burton  
South Shore Millwork  
7 Maple Street  
Norton, MA 02766

**RE: NORTON**  
Transmittal No.: X263847  
Application No.: SE-15-004  
Class: *SM-50*  
FMF No.: 550630  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Burton:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Non-Major Comprehensive Plan Application (“Application”) listed above. This Application concerns the continued operation of 2 existing spray booths and the proposed construction of two new spray booths at your architectural millwork manufacturing facility located at 7 Maple Street in Norton, Massachusetts (“Facility”). The Application bears the seal and signature of Mr. Eric A. Pearson, Massachusetts Registered Professional Engineer Number 39741.

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-N, 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**

South Shore Millwork, Inc. is a manufacturer of cabinetry and other architectural millwork products on a customer-demand, job shop basis. Facility operations include wood products surface coating and associated cleaning activities and adhesive application, as well as millwork activities, including cutting, planning, sanding, routing and drilling.

### **Existing Operations:**

Existing wood products surface coating is conducted using high volume, low pressure (HVLP), or equivalent, spray guns in 2 existing spray booths. Coatings are also applied manually by wiping or with rollers. The spray booths meet the design requirements outlined at 310 CMR 7.03(16). The facility currently operates 8 hours per day, 5 days per week, or approximately 2080 hours per year.

Adhesive application is conducted using HVLP spray guns and pressure pots or by manual roller application. The sealants are manually applied. Cleaning activities are conducted using a variety of solvent materials, including acetone, mineral spirits, VMP naphtha, methyl ethyl ketone, denatured alcohol, and lacquer thinner. Spray gun cleaning is conducted with a closed-loop cleaning device that re-circulates the cleaning solvent and minimizes solvent evaporation.

Millwork activities are conducted at various work stations. These activities generate wood dust that is collected with local pickups and transported to one of two dust collectors. The exhaust from each dust collector vents inside the building with no emissions to the ambient air.

Existing fuel burning equipment consists of natural gas-fired heating and cooling units each with a heat input rating of less than 0.5 MMBtu/hr, natural gas-fired air makeup units for spray booth 1 and spray booth 2 each with a heat input rating of less than 2.5 MMBtu/hr. All fuel burning equipment has a heat input capacity of less than 10 MMBtu/hr and is exempt from plan approval requirements in accordance with 310 CMR 7.02(2)(b)15. In addition, the facility has installed approximately 3 acres of solar panels, as well as a roof-top array, to generate approximately 866 kW of electrical power for use at the facility.

### **Application and proposed modifications:**

Application No. SE-15-004 was submitted, as required by Administrative Consent Order No. ACOP-SE-14-9002-27, regarding the continued operation and proposed modification of coating and finishing equipment at the Permittee's architectural millwork manufacturing and assembly facility.

The Permittee has proposed to install two additional spray booths as part of a facility expansion. The expansion includes the installation of associated natural gas-fired air makeup units and heating and cooling equipment. The proposed fuel burning equipment all has a maximum heat input of less than 10.0 MMBtu/hr firing natural gas and is exempt from plan approval requirements in accordance with 310 CMR 7.02(2)(b)15. The wood products surface coating

operations at the facility result in emissions of Volatile Organic Compounds (VOC), Hazardous Air Pollutants<sup>1</sup> (HAP), Particulate Matter (PM) and non-criteria air pollutants [e.g. Acetone, parachlorobenzotrifluoride (PCBTF), etc.]. As part of this application, the Permittee has proposed operational limits and emission limits for the existing and proposed wood products surface coating operation.

In addition to paint spray booth operations, the facility is proposing to establish operational limits and emission limits for adhesives, sealants, and cleaning solvent usage at the facility. The adhesive, sealant, and cleaning operations at the facility result in emissions of VOC, HAP and non-criteria air pollutants.

The HAP emission limits established in this approval restrict the facility to less than major source levels as defined in 40 CFR Part 63.2. As an area source of HAP, the facility is not subject to requirements at 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations.

The Best Available Control Technology (BACT) for this application is defined in Table 2 and consists of operating the paint spray booths in accordance with the requirements of 310 CMR 7.03(16), the use of best management practices, pollution prevention, and a limitation on raw material usage.

## 2. EMISSION UNIT IDENTIFICATION

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

<b>Table 1</b>			
<b>EU</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU1 <u>Wood Surface Coating Operations</u>	<u>Existing Spray Booth 1:</u> Greenheck 20 ft x 8.8 ft x 7.5 ft <sup>(Note 1)</sup>	30,000 cfm	HVLP spray gun (or equivalent) Fabric Filter
	<u>Existing Spray Booth 2:</u> Binks 16 ft x 8 ft x 7 ft <sup>(Note 1)</sup>	20,000 cfm	HVLP spray gun (or equivalent) Fabric Filter
	<u>New Spray Booth 3:</u> Global Finishing (or equivalent) 20 ft x 10 ft x 9 ft <sup>(Note 1)</sup>	25,000 cfm	HVLP spray gun (or equivalent) Fabric Filter
	<u>New Spray Booth 4:</u> Binks (or equivalent) 16 ft x 8 ft x 7 ft. <sup>(Note 1)</sup>	20,000 cfm	HVLP spray gun (or equivalent) Fabric Filter

<sup>1</sup> Hazardous Air Pollutants are as listed in the 1990 Clean Air Act (CAA) Amendments, Section 112(b).

<b>Table 1</b>			
<b>EU</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU2 <u>Adhesive/Sealant/Cleaning operations</u>	Millwork assembly area Spray booths, Spray guns	N/A	None

**Table 1 Notes:**

**Note 1:** Spray booth dimensions are in feet and represent width x height x depth

**Table 1 Key:**

cfm = cubic feet per minute

EU = emission unit

HVLP = high volume, low pressure

N/A = not applicable

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:

<b>Table 2</b>			
<b>EU</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>
EU1	1. Face velocity of air at filter(s) shall not exceed 200 feet per minute.	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	220 lbs/month
			0.33 TPY
	2. ≥ 98 % by weight particulate control. 3. ≥ 65% Transfer Efficiency	Visible Emissions	0% Opacity
		VOC	8,960 lbs/month
			13.44 TPY
4. VOC as contained in materials used shall not exceed 8,960 pounds per month.			
5. VOC as contained in materials used shall not exceed 13.44 tons per consecutive twelve-month period.			

<b>Table 2</b>			
<b>EU</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>
EU1	6. VOC content of any coatings used shall not exceed the “as applied” emission limitations contained in 310 CMR 7.18(23)(e), Table 310 CMR 7.18(23)(e)1. <sup>(Note 1)</sup>	VOC	<u>Semitransparent stain</u> ≤ 89.4 lbs VOC per gallon solids, as applied  <u>Wash coat</u> ≤ 35.6 lbs VOC per gallon solids, as applied  <u>Opaque stain</u> ≤ 13.0 lbs VOC per gallon solids, as applied  <u>Sealer</u> ≤ 23.4 lbs VOC per gallon solids, as applied  <u>Pigmented coat</u> ≤ 15.6 lbs VOC per gallon solids, as applied  <u>Clear topcoat</u> ≤ 23.4 lbs VOC per gallon solids, as applied
	7. Limit the VOC content of any surface preparation solution used prior to coating as required at 310 CMR 7.03(16)(g). <sup>(Note 2)</sup>		1.67 pounds of VOC per gallon
	8. HAP as contained in materials used shall not exceed 900 pounds per month.	HAP	900 lbs/month
	9. HAP as contained in materials used shall not exceed 1.36 tons per consecutive twelve-month period.		1.36 TPY
	10. Non-criteria pollutants <sup>(Note 3)</sup> as contained in materials used shall not exceed 5,260 pounds per month.	Non-criteria pollutants (i.e. VOC exempt organic compounds)	5,260 lbs/month
	11. Non-criteria pollutants <sup>(Note 3)</sup> as contained in materials used shall not exceed 7.88 tons per consecutive twelve-month period.		7.88 TPY
EU2	12. VOC as contained in materials used shall not exceed 2,280 pounds per month.	VOC	2,280 lbs/month
	13. VOC as contained in materials used shall not exceed 3.41 tons per consecutive twelve-month period.		3.41 TPY
	14. Adhesives used shall not exceed the VOC content limit for wood substrates as contained in 310 CMR 7.18(30)(c): Table 2.		30 grams of VOC per liter <sup>(Note 4)</sup>

<b>Table 2</b>			
<b>EU</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>
EU2	15. Sealants used shall not exceed the VOC content limit for architectural sealants as contained in 310 CMR 7.18(30)(c): Table 1.	VOC	250 grams of VOC per liter <sup>(Note 4)</sup>
	16. Limit the VOC content of any surface preparation solution used prior to application of adhesive or sealant as required at 310 CMR 7.18(30)(c)5.a.		< 70 grams of VOC per liter <sup>(Note 4)</sup>
	17. HAP as contained in materials used shall not exceed 180 pounds per month.	HAP	180 lbs/month
	18. HAP as contained in materials used shall not exceed 0.27 tons per consecutive twelve-month period.		0.27 TPY
	19. Non-criteria pollutants <sup>(Note 3)</sup> as contained in materials used shall not exceed 760 pounds per month.	Non-criteria pollutants (i.e. VOC exempt organic compounds)	760 lbs/month
	20. Non-criteria pollutants <sup>(Note 3)</sup> as contained in materials used shall not exceed 1.13 tons per consecutive twelve-month period.		1.13 TPY

**Table 2 Notes:**

Note 1: The Permittee has proposed the emission limitations of 310 CMR 7.18(23)(e), Table 310 CMR 7.18(23)(e)1.as BACT for this application. The Permittee is not currently subject to the requirements at 310 CMR 7.18(23).

Note 2: The Permittee has proposed to comply with the requirements of 310 CMR 7.03(16) as BACT for this application. The Permittee is not subject to the requirements at 310 CMR 7.03(16).

Note 3 = In accordance with the definitions a 310 CMR 7.00, Acetone (CAS 67641) and PCBTF are organic compounds that are not included in the definition of VOC.

Note 4 = VOC content is determined as the weight of volatile compounds, less water and exempt compounds, as specified in 310 CMR 7.18(30)(f)

**Table 2 Key:**

CMR = Code of Massachusetts Regulations

EU# = Emission Unit Number

lbs = pounds

PCBTF = Parachlorobenzotrifluoride (CAS No. 98566)

PM = Total Particulate Matter

PM<sub>10</sub> = Particulate Matter less than or equal to 10 microns in diameter

PM<sub>2.5</sub> = Particulate Matter less than or equal to 2.5 microns in diameter

VOC = Volatile Organic Compounds

HAP = total Hazardous Air Pollutants.

TPY = tons per consecutive 12-month period

≥ = greater than or equal to

≤ = less than or equal to

% = percent

**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:

<b>Table 3</b>	
<b>EU</b>	<b>Monitoring and Testing Requirements</b>
EU1	1. The Permittee shall monitor each month, pounds of VOC as contained in wood surface coating materials used.
	2. The Permittee shall monitor each month, pounds of HAP as contained in wood surface coating materials used.
	3. The Permittee shall monitor each month, pounds of VOC exempt organic compounds (e.g. Acetone, PCBTF, etc) as contained in wood surface coating materials used.
	4. The Permittee shall ensure that all spray booths are equipped with instrumentation to continuously monitor the pressure drop across the spray booth fabric filters, when operating to ensure manufacturer's recommended specifications for collection efficiency are being met.
	5. Testing shall be conducted in accordance with USEPA Method 24 and/or Method 25 as described in CFR Title 40 Part 60, or by other methods approved by the Department and USEPA.
EU2	6. The Permittee shall monitor each month, pounds of VOC as contained in adhesives used.
	7. The Permittee shall monitor each month, pounds of VOC as contained in sealants used.
	8. The Permittee shall monitor each month, pounds of VOC, HAP and VOC exempt organic compounds (e.g. Acetone, PCBTF, etc) as contained in cleaning materials used.
	9. The Permittee shall monitor usage of adhesives used in product assembly in order to comply with the recordkeeping requirements at 310 CMR 7.18(30)(e).
	10. The Permittee shall use the applicable compliance measures and Test Methods identified in 310 CMR 7.18(30)(f).
Facility-wide	11. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	12. 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.
	13. At least 30 days prior to emission testing, the Permittee shall submit to MassDEP for approval a stack emission pretest protocol.
	14. Within 45 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.

**Table 3 Key:**

- CFR = Code of Federal Regulations
- CMR = Code of Massachusetts Regulations
- EU# = Emission Unit Number
- PCBTF = Parachlorobenzotrifluoride (CAS No. 98566)
- HAP = total Hazardous Air Pollutants
- USEPA = United States Environmental Protection Agency
- VOC = Volatile Organic Compounds

**Table 4**

<b>EU</b>	<b>Record Keeping Requirements</b>
EU1	<ol style="list-style-type: none"> <li>1. The Permittee shall record the pressure drop across the spray booth fabric filters in each spray booth at least once per day during which coating operations occur and record the acceptable limit of pressure drop as specified by the fabric filter or spray booth manufacturer.</li> <li>2. Sufficient records shall be prepared and maintained to demonstrate compliance for each calendar month. Such records shall include, but are not limited to:               <ol style="list-style-type: none"> <li>A. For each coating, as applied:                   <ol style="list-style-type: none"> <li>1) Gallons of coating used;</li> <li>2) Coating density (Pounds per gallon);</li> <li>3) Pounds of VOC per gallon of coating;</li> <li>4) Pounds of HAP per gallon of coating;</li> <li>5) Pounds of acetone per gallon of coating;</li> <li>6) Pounds of PCBTF per gallon coating;</li> <li>7) Pounds of solids per gallon of coating;</li> <li>8) Pounds of water per gallon of coating;</li> <li>9) Pounds of other non-VOC liquid per gallon of coating; and</li> <li>10) Pounds of VOC per gallon of solids as applied.</li> </ol> </li> <li>B. Gallons of exempt/non-compliance coatings used; and</li> <li>C. Maintenance records of filter pad replacement and disposal.</li> </ol> </li> </ol>
EU2	<ol style="list-style-type: none"> <li>3. The Permittee shall maintain a record for each calendar month of the identity, quantity, formulation and density of any cleanup solvent(s) used.</li> <li>4. In accordance with 310 CMR 7.18 (30)(e), the Permittee shall maintain sufficient records to demonstrate compliance including:               <ol style="list-style-type: none"> <li>A. a data sheet or materials list that provides the material name, product category according to 310 CMR 7.18(30)(c): <i>Table 1</i>, and <i>Table 2.</i>, manufacturer identification, the VOC content of each product as supplied, and type of material application;</li> <li>B. a list of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent, and surface preparation solvent in use and in storage;</li> <li>C. a list of reducers, catalysts, or other components used and the as applied mix ratio;</li> <li>D. the final VOC content of any adhesive, sealant, adhesive primer, or sealant primer as applied;</li> <li>E. the VOC content and vapor pressure, of any cleanup solvents, surface preparation solvents, reducers and catalysts, and VOC-containing materials used in the preparation, application, rework, and cleaning processes related to use or application of any adhesive, sealant, adhesive primer, or sealant primer;</li> <li>F. the monthly volume of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent, and surface preparation solvent used;</li> <li>G. all records pertaining to compliance testing pursuant to 310 CMR 7.18(30)(h); and</li> <li>H. the monthly total facility-wide VOC emissions from all adhesives, sealants, adhesive primers, and sealant primers used or applied at any facility where a person is claiming an exemption pursuant to 310 CMR 7.18(30)(d)4.</li> </ol> </li> </ol>

<b>Table 4</b>	
<b>EU</b>	<b>Record Keeping Requirements</b>
Facility-wide	5. The Permittee shall maintain adequate records on-site to demonstrate compliance status 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 <sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at <a href="http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping">http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping</a> .
	6. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	7. 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.
	8. 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.
	9. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), 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.
	10. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	11. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	12. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

**Table 4 Key:**  
 CMR = Code of Massachusetts Regulations  
 EU = Emission Unit  
 HAP = Hazardous Air Pollutant(s)  
 PCBTF = Parachlorobenzotrifluoride (CAS No. 98566)  
 PCD = Pollution Control Device  
 SOMP = Standard Operating and Maintenance Procedure  
 USEPA = United States Environmental Protection Agency  
 VOC = Volatile Organic Compound(s)

<b>Table 5</b>	
<b>EU</b>	<b>Reporting Requirements</b>
Facility-wide	<ol style="list-style-type: none"> <li>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).</li> </ol>
	<ol style="list-style-type: none"> <li>2. The Permittee shall notify the Southeast Regional Office of MassDEP, BAW Compliance &amp; Enforcement Chief by telephone: 508-946-2817 or fax : 508-947-6557, as soon as possible, but no later than three (3) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Compliance &amp; Enforcement 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).</li> </ol>
	<ol style="list-style-type: none"> <li>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.</li> </ol>

**Table 5 Key:**  
 AQ = Air Quality  
 BAW = Bureau of Air and Waste  
 CMR = Code of Massachusetts Regulations  
 EU# = Emission Unit Number

#### **4. SPECIAL TERMS AND CONDITIONS**

A. The Permittee is subject to, and shall comply with, the Special Terms and Conditions as contained in Table 6 below:

<b>Table 6</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
EU1	<ol style="list-style-type: none"> <li>1. All coatings used in the wood surface coating operations shall comply with the as-applied formulations contained in 310 CMR 7.18(23) Wood Products Surface Coating. Notwithstanding the previous statement, the emissions of VOC from any coatings used in small amounts at the facility are exempt from the emission limitations of 310 CMR 7.18(23), provided the person satisfies the following conditions:               <ol style="list-style-type: none"> <li>a. the total amount of all coatings exempted does not exceed 55 gallons during any rolling 12 month period at the facility; and,</li> <li>b. the person identifies and tracks the usage of the coatings covered by this exemption; and,</li> <li>c. the person complies with the record keeping and testing requirements as noted in Table 3 and Table 4 above.</li> </ol> </li> </ol>
Facility-wide	<ol style="list-style-type: none"> <li>2. This Plan Approval supersedes the facility wide VOC emission limitations established in ACOP-SE-15-9002-27 at Section III., Paragraph 8.A. and the corresponding recordkeeping requirement at Section III., Paragraph 8.B.</li> </ol>

<b>Table 6</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
Facility-wide	3. Spray guns shall be cleaned in a device that minimizes solvent evaporation during the cleaning, rinsing, and draining operations; re-circulates solvent during the cleaning operation so that the solvent is reused; and collects spent solvent in a container with a tight fitting cover so that it is available for proper disposal or recycling. No halogenated solvents shall be used in spray gun cleaning.
	4. The Permittee shall store and dispose of volatile organic compounds in a manner which will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover.
	5. The Permittee shall conduct all handling and transferring operations involving VOC, HAP and/or VOC exempt organic compound containing solvents in a way that minimizes spills and releases of VOC, HAP and/or VOC exempt organic compounds.
	6. The Permittee shall comply with any applicable requirements at 310 CMR 7.18 <u>Volatile and Halogenated Organic Compounds</u> including §7.18(30) <u>Adhesives and Sealants</u> .
	7. The Permittee may reconcile the VOC, HAP and/or VOC exempt organic compounds contained in any hazardous waste shipped during a month when determining monthly emissions. The facility shall maintain hazardous waste disposal records and purchase records for VOC, HAP and/or VOC exempt organic compound containing materials for this purpose. Such records shall verify the VOC, HAP and/or specific VOC exempt organic compounds quantity present in the waste being shipped if reconciling monthly emissions.

**Table 6 Key:**  
 CMR = Code of Massachusetts Regulations  
 EU# = Emission Unit Number  
 HAP = Hazardous Air Pollutant(s)  
 VOC = Volatile Organic Compound(s)  
 § = section

- 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.”
- C. The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7, for the Emission Units that are regulated by this Plan Approval:

<b>Table 7</b>				
<b>EU</b>	<b>Stack Height Above Ground (feet)</b>	<b>Stack Inside Exit Dimensions (feet)</b>	<b>Stack Gas Exit Velocity Range (feet per second)</b>	<b>Stack Gas Exit Temperature Range (°F)</b>
EU1- Spray Booth 1	34	3.66	40-55	60-80
EU1- Spray Booth 2	34	3.00	40-55	60-80

<b>Table 7</b>				
<b>EU</b>	<b>Stack Height Above Ground (feet)</b>	<b>Stack Inside Exit Dimensions (feet)</b>	<b>Stack Gas Exit Velocity Range (feet per second)</b>	<b>Stack Gas Exit Temperature Range (°F)</b>
EU1- Spray Booth 3	34	3.33	40-55	60-80
EU1- Spray Booth 4	34	3.00	40-55	60-80

**Table 7 Key:**  
 EU = emission unit  
 °F = degrees 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 Peter Russell by telephone at (508) 946-2821, or in writing at the letterhead address.

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.*

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Thomas Cushing  
Permit Chief  
Bureau of Air and Waste

Enclosure

ecc: Town of Norton, Board of Health  
Town of Norton, Fire Department  
Cindy Hurd, South Shore Millwork  
Eric Pearson, ESS Group  
MassDEP/Boston – Yi Tian  
MassDEP/SERO – Maria Pinaud, Peter Russell