



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

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July 29, 2016

Mr. Bob Beardsley  
Data Guide Cable Corporation  
232 Sherman St  
Gardner, MA 01440

**RE: Gardner**  
Transmittal No.: X270136  
Application No.: CE-16-008  
Class: SubMin  
FMF No.: 130671  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Robert Beardsley:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the operation of the printing and striping lines at your wire and cable manufacturing facility located at 232 Sherman Street in Gardner, Massachusetts (“Facility”).

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-O, 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**

Data Guide Cable Corporation (DGC) manufactures custom specialty electronic and electrical wire and cable products for several markets including data communication, utility and factory automation.

The Facility formerly operated cable manufacturing equipment including extruder printers and gravure strippers at 560 Main, Gardner, MA under air quality Plan Approval, TR#131622 (issued August 12, 1996). The cable manufacturing equipment was moved from Main Street to 232 Sherman St, Gardner, MA in 2011. The Main St., Gardner facility was demolished. Plan Approval, TR#1311622 for 560 Main St, Gardner, MA was rescinded.

On November 24, 2015, MassDEP conducted a compliance inspection and determined that DGC failed to obtain an air quality Plan Approval for the installation of equipment that had the potential to emit more than one ton of volatile organic compounds (VOCs). A Notice of Noncompliance (NON-CE-15-9030-27) was issued for failure to obtain an air quality Plan Approval for the new location.

On April 6, 2016, MassDEP received an air quality limited plan application for equipment located at 232 Sherman St, Gardner, MA. Revised plan application forms were received by MassDEP on July 14, 2016.

The Facility insulates and jackets solid and stranded copper and tin-plated copper wire with a variety of thermoplastic resins including polyvinyl chloride (PVC), polyethylene (PE), polypropylene (PP) and zero halogen PVC. Color concentrates and plastic pellets are melted and applied to the wire at two (2) die extruding lines. Plastic containing lead and antimony are not used in the process. The extruded wire continues through a water bath, is marked with two ink jet printers (per extruding line) and then wound onto a reel. Only one ink jet printer operates at a time. After insulation, conductors are twisted together, cabled, taped and then jacketed in a process similar to the insulation. Specification markings (striping) are printed on the cable jacketing.

The printers, strippers and the cleaning formulations contain volatile organic compounds (VOC) and hazardous air pollutants (HAP). Methyl isobutyl ketone (MIBK) is the single HAP with the highest air emissions. The ink flow and operation of the striping printing systems is computer controlled to minimize ink usage and VOC and HAP emissions. Air emissions at the two ink jet printers serving each of the extruding lines are vented internally and are considered fugitive emissions. Emissions from the four (4) striping lines are manifolded together and vented via a single stack to the ambient air. Good housekeeping measures will minimize VOC and HAP emissions. These measures include tightly covering containers of ink formulations, soiled rags, cleaning materials and hazardous waste.

MassDEP has determined that Good Housekeeping measures are Best Available Control Technology for this operation.

## 2. EMISSION UNIT (EU) 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>
1	Cable printing and cleaning	NA	NA
2	Cable striping	NA	NA

**Table 1 Key:**

EU = Emission Unit Number  
 NA = 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>	
			<b>TPM</b>	<b>TPY</b>
1 and 2	NA	VOC	0.30	3.70
		HAP (single)	0.01	0.10
		HAP (total)	0.01	0.10

**Table 2 Key:**

EU = Emission Unit Number  
 HAP (single) = Single Hazardous Air Pollutant  
 HAP (total) = total Hazardous Air Pollutants

NA = not applicable  
 TPM = tons per month  
 TPY = tons per consecutive 12-month period  
 VOC = Volatile Organic Compound

**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>
1 and 2	1. The Permittee shall monitor the quantities (gallons) of ink and cleaning formulations on a monthly and annual basis.
Facility-wide	2. 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:**

CMR = Code of Massachusetts Regulations  
 EU = Emission Unit Number

USEPA = United States Environmental Protection Agency

<b>Table 4</b>	
<b>EU</b>	<b>Record Keeping Requirements</b>
1	1. The Permittee shall maintain daily records, such as but not limited to: a) Identity, quantity (gallons), formulation and density of inks or coatings used ; and b) Identity, quantity (gallons), formulation and density of any diluent(s) and clean-up solvent(s) used.
2	2. The Permittee shall maintain records for each cable striping job, such as but not limited to: a) Identity, quantity (gallons), formulation and density of inks or coatings used ; and b) Identity, quantity (gallons), formulation and density of any diluent(s) and clean-up solvent(s) used.
1 and 2	3. The Permittee may utilize a materials balance to quantify VOC and HAP emissions. The quantity of the hazardous waste shipped off site may be subtracted from the annual coating usage totals to calculate the quantity of air emissions. The Permittee shall maintain on site records that documents the quantity of wastes shipped off site and the solvent percentage by weight of the waste.

<b>Table 4</b>	
<b>EU</b>	<b>Record Keeping Requirements</b>
Facility wide	4. 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 <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>
	5. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	6. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.
	7. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s). The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	8. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(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.
	9. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	10. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

**Table 4 Key:**

EU = Emission Unit Number

MassDEP = Massachusetts Department of Environmental Protection

USEPA = United States Environmental Protection Agency

SOMP = Standard Operating and Maintenance Procedure

<b>Table 5</b>	
<b>EU</b>	<b>Reporting Requirements</b>
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 Central Regional Office of MassDEP, Roseanna E. Stanley, BAW Permit Chief by telephone: 508.752.5967, email: Roseanna.Stanley@massmail.state.ma.us or fax : 508.792.7692, 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 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 provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP’s request.
	4. 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.
	5. 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.

**Table 5 Key:**

BAW = Bureau of Air and Waste

MassDEP = Massachusetts Department of Environmental Protection

EU = Emission Unit Number

#### 4. SPECIAL TERMS AND CONDITIONS

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

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

<b>Table 6</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
Facility-wide	1. The Permittee shall utilize, store, cover and dispose of all inks, cleaners and rags containing these materials in a manner that will minimize evaporation of VOC, HAP and odor emissions to the atmosphere. Proper storage shall be in a container with a tight fitting cover.

**Table 6 Key:**

EU = Emission Unit Number

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutant

- 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 (inches)</b>	<b>Stack Gas Exit Velocity Range (feet per second)</b>	<b>Stack Gas Exit Temperature Range (°F)</b>
2	18	24	116	65-75

**Table 7 Key:**

EU = Emission Unit

°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 laws or regulations now or in the future.
- F. The Application is incorporated into this Plan Approval by reference. 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) and a completed Adjudicatory Hearing Fee Transmittal Form, a copy of which is attached hereto, 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 Maria L'Annunziata by telephone at 508-767-2748, or in writing at the letterhead address.

**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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Roseanna E. Stanley  
Permit Chief  
Bureau of Air and Waste

Enclosures:

- Adjudicatory Hearing Fee Transmittal Form
- Stamped Plan Application

ecc: Gardner Health Department  
Gardner Fire Department  
MassDEP/Boston - Yi Tian  
Mark Rollins, A-EHS 360 Canterbury Rd, Brooklyn, CT 06234