



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Charles D. Baker
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June 13, 2016

Mr. Darwin M. Irish,
Director, Risk Management
FLEXcon Company, Inc.
1 FLEXcon Industrial Park
Spencer, MA 01562

RE: Spencer
Transmittal No.: X269135
Application No.: CE-16-007
Class: OP
FMF No.: 130929
FINAL AIR QUALITY PLAN APPROVAL

Dear Mr. Irish:

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 installation and operation of a 3 zone oven serving a coating line in Plant 4 of your facility located at 1 FLEXcon Industrial Park in Spencer, 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-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

FLEXcon Company, Inc. (“FLEXcon”) is a manufacturer of pressure sensitive materials headquartered in Spencer, Massachusetts. Its manufacturing processes include coating, laminating, and finishing pressure-sensitive materials used in a variety of applications ranging from product identification labels, picture on picture and promotional graphics, stickers and decals. A majority of pressure sensitive coating production occurs in Plants 2, 4 and 5.

FLEXcon is classified as a major source of volatile organic compounds (“VOC”) and hazardous air pollutant (“HAP”) emissions and as such the Facility operates under an Operating Permit (“OP”) issued pursuant to 310 CMR 7.00, Appendix C. The majority of the VOCs utilized in the manufacture of films and adhesives are HAPs. The VOCs and HAPs are components of the coatings and adhesives applied to a web of paper or plastic. Examples of HAPs used in the formulations include: toluene, vinyl acetate, and xylene.

FLEXcon also uses coatings that contain ammonia hydroxide, CAS number 1336-21-6. It is added to coatings to control pH and is necessary to ensure the stability of the adhesive. Ammonium Hydroxide, is present in some water based coatings at the Spencer facility in de minimus quantities (typically <0.5%) and results in ammonia emissions.

MassDEP issued TR#X255579 which updated, revised, and consolidated all previous plan approvals into a single Plan Approval. Updates included voluntary reduction of some emissions limits, material use restrictions, reassignment of Emission Units, and revised recordkeeping and reporting requirements (see Appendix A for a summary of changes).

MassDEP issued TR#X268753 on April 8, 2016 for the installation of a new DURR regenerative thermal oxidizer to control VOC and HAP emission from coating lines PS 12 and 13 located in Plant 5. The new RTO is rated at 3,000,000 btu/hr and will be equipped with low nitrogen oxides (NOx) burners but will add to the facility wide combustion related emissions.

Project Description

This Plan Approval addresses the replacement of a 2-zone natural gas oven serving emission unit (“EU”) PS8 with a new 3-zone natural gas drying/curing oven in Plant 4. The emission exhaust from PS8 will be re-routed from the Alstom regenerative thermal oxidizer (RTO) to an existing TANN RTO also located in Plant 4. The TANN RTO represents Top-Case Best Available Control Technology (BACT) by providing 100% capture efficiency and 99% destruction removal efficiency. The new oven has a larger fuel input rating and will result in additional combustion byproduct emissions.

Additionally, this Plan Approval will supercede Plan Approval TR# X268753, recently updated on April 8, 2016. Facility wide NOx and CO emissions will increase from the new oven and the inclusion of combustion emissions from the RTOs. Facility wide carbon dioxide (CO₂)

emissions will be added. Facility wide VOC and HAP emissions remain unchanged. See Table 2 for Facility wide emissions.

Applicable Regulations:

The Permittee shall comply with the Federal and State Regulations listed below. The applicable test method and procedures to be used during compliance testing are stated in referenced 40 CFR Subparts.

Process

- ❖ 40 CFR 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations -New Source Performance Standards (“NSPS”),
- ❖ 40 CFR 63, Subpart JJJJ - Paper and other Web Surface Coating, National Emission Standards for Hazardous Air Pollutants (“NESHAPS”). 40 CFR 63 Subpart JJJJ defines water based coatings as coatings consisting of aqueous solutions of polymer resins with less than 4% of VOC and HAP by weight.
- ❖ 40 CFR 63 Subpart JJJJ and 40 CFR 60 Subpart RR apply to the following emission units: PS4, PS7, PS8, PS9, PS10, PS11, PS12, PS13, PS14, DYE, TC2-3, TC2-4, TC2-5, 2LB1, 2LB2, 2LB3, 2LB4, 2LB5 and 5X01.

Emergency Generators

E1-E5 – emergency generators are not regulated by this Plan Approval but their emissions are included in the facility wide emissions.

- ❖ EU 1 is a DMT emergency generator (model 125GC) with a maximum input rating of 1.85 MM Btu/hr (125kW) installed in 1987
- ❖ EU 2 is a Kohler emergency generator (model 80RZ72) with a maximum input rating of 1.38 MM Btu/hr (80 kW) installed in 1991
- ❖ EU 3 a Kohler emergency generator (model 80RZ72) with a maximum input rating of 1.38 MM Btu/hr (80 kW) installed in 1991
- ❖ EU 4 is a Kohler emergency generator (model 70RZ2726372) with a maximum input rating of .97 MM Btu/hr (60kW) installed in 1991
- ❖ EU 5 is a Kohler emergency generator (model 180REZXB) rated at 1.38 MMBtu/hr (180 kW or 241 Hp) installed in the Technology Center in 2012. EU 5 - is subject to the Environmental Results Program (“ERP”) Certification, 310 CMR 7.26(42).

Boilers

- ❖ Although the boilers are subject to 40 CFR 63, Subpart DDDDD - NESHAPS for Industrial, Commercial and Institutional Boiler and Process Heaters at a major HAP facility, they are not regulated under this Plan Approval because of their sizes. Emissions from the combustion of fuel in the boilers are included in the Facility wide total.

Facility Wide

❖ 310 CMR 7.00, Appendix C, Operating Permit and Compliance Program

2. EMISSION UNIT (EU) IDENTIFICATION

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

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
PS4 ¹	Pressure sensitive Adhesive Label Coating line and Corona treaters with NG oven	2.50 MMBtu/Hr Primary corona treater = 7kW Secondary corona treater= 2kW	Plant 4 TANN RTO ³ (10,000 scfm) with permanent total enclosure (PTE)
PS7	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	6.00 MMBtu/hr Corona treater = 3kW	
PS8	Pressure sensitive Adhesive Label Coating line and Corona treater with 3 zone NG oven	7 MMBtu/hr Corona treater = 3kW	
PS9	Custom Built Water Based Pressure Sensitive Adhesive Label Coating Line and Corona Treater with NG oven	7.50 MMBtu/hr Corona treater = 15kW	N/A
PS10	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven rated	6.80 MMBtu/hr Corona treater = 3kW	Plant 4 Alstom RTO with PTE (80,000 scfm)
PS11	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	5.19MMBtu/hr Corona treater = 3kW	
PS12	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	5.61 MMBtu/hr Corona treater = 3kW	Plant 5 Durr RTO with PTE (22,000 scfm)
PS13 ¹	Pressure sensitive Adhesive Label Coating line and Corona treaters	Primary corona treater = 5kW Secondary corona treater= 15kW	

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
PS14	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	8.25MMBtu/hr corona treater = 15kW Max rate of 230 gph of solvent based coatings and adhesives.	Plant 5 ABB RTO with PTE (60,000 cfm)
DYE	Custom Built Dye Coating Machine		Plant 2 ABB Thermal Oxidizer with PTE (40,000 cfm)
TC2-3	Top Coating Line and Corona Treater with NG oven	3.2 MMBtu/hr corona treater = 5kW	
TC2-4	Top Coating Line and Corona Treater with NG oven	3 MMBtu/hr corona treater= 4kW	
TC2-5 ¹	Custom Built Top Coating Line and Corona Treaters with NG oven	4 MMBtu/hr 50 gph coating /adhesive Primary corona treater = 4kW Bottom corona treater = 5kW top corona treater = 5kW	
2LB5 ¹	Modular Coater and Corona Treaters	58 gph coating /adhesive	
2LB1	ITW Dynatec Hot Melt Adhesive Pilot Coater 20 inch web	11 gph coating/adhesive 1500 ft/min	N/A
2LB2	ETI Inc. Hot Melt Adhesive Pilot Coater, UV curing station and Corona Treaters	47 gph of coating /adhesive 500 ft/min Primary corona treater = 3kW Secondary corona treater= 6kW	N/A
2LB3	Faustel Labmaster A Pilot Coater (water or solvent or hot melt coatings) 12 inch web	9 gph coating/adhesive 98 ft/min	Plant 2 ABB Thermal Oxidizer with PTE (40,000 scfm)

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
2LB4 ²	Hot Melt Coater and Corona Treater	71 gph coating /adhesive corona treater = 2kW	N/A
2S01	Corona Treater	5kW	N/A
5X01	Silicone Coater and Corona Treater 80 inch web width	15 gph coating/ adhesive 120 ft/min corona treater = 15kW	N/A

Table 1 Key:

CMR = Code of Massachusetts Regulations
 EU# = Emission Unit Number
 ft/min = feet per minute
 Gph = gallons per hour
 kW = kilowatts
 SCFM = standard cubic feet per minute

N/A = not applicable
 NG = Natural gas
 PTE = permanent total enclosure
 RTO = regenerative thermal oxidizer
 PCD = Pollution Control Device

Table 1 Notes:

1. EU PS 4, EU PS13, EU 2LB2, and EU 2LB5 each have a primary and secondary corona treater. EU TC2-5 has a primary, top, and bottom corona treater.
2. On April 6, 2010, FLEXcon notified the MassDEP via letter, that FLEXcon would be installing the Hot Melt Coater (2LB4). The coater is exempt from air quality Plan Approval as its potential emissions are less than 1.0 TPY.
3. On April 7, 2016 MassDEP issued an approval to postpone compliance testing on the TANN RTO in Plant 4 to allow the reconfiguration of PS8 into that RTO. The approval allows up to 180-days after the initial start up of the modified PS8 coater and RTO system to conduct compliance testing on the RTO.

Table 1A			
Corona Treaters (Ozone Emissions)			
EU#^[1]	Make	Model	KW
PS4 (Primary)	ENERCON	LM3436	7
PS4 (Secondary)	SHERMAN	PBS1700100UAX2PNTX	2.0
PS7	ENERCON	LM3355-08	3
PS8	ENERCON	LM4175-39	3
PS9	ENERCON	LM4176-40	15
PS10	ENERCON	AS011PV-150/104157-03	3
PS11	ENERCON	ASO11V-160	3
PS12	ENERCON	ASO11V-160	3
PS13 (Primary)	ENERCON	ASO11PV-150	5
PS13 (Secondary)	ENERCON	LM4176-04	15
PS 14	ENERCON	ASO31PV-300H	15
5X01	ENERCON	LM3446-46	15
TC2-3	ENERCON	ASO11PV-150	5
TC2-4	ENERCON	LM4175-40	4
TC2-5 (Primary)	ENERCON	LM4174-28	4
TC2-5 (Bottom)	ENERCON	ASO12V-150H	5
TC2-5 (Top)	ENERCON	ASO12V-150H	5
2LB2 (Primary)	ETI	CUSTOM	3
2LB2 (Secondary)	ETI	CUSTOM	6
2LB4	SOFTAL	CEE79	2
2S01	SHERMAN		5
2LB5 (Primary)	ENERCON	ASO11PV-150HK	2
2LB5 (Secondary)	ENERCON	ASO11PV-150HK	2

Table 1A Key:

EU# = Emission Unit Number

kW= kilowatt

TPY= tons per consecutive 12-month period

Table 1A Note:

1. Process lines EU PS4, EU PS13, EU 2LB, and EU2LB5 each have a primary corona treater and secondary corona treater. The only difference between a primary and secondary corona treater is the location of the unit on the process line. For the majority of products FLEXcon uses only the primary corona treater.

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:

Table 2				
EU#	Operational / Production Limit	Air Contaminant	Emission Limit	
			Monthly emissions (tpm)	Annual emissions¹ (tpy)
PS4	NA	VOC	2.0	9.9
		HAP	2.0	9.9
PS7	NA	VOC/HAP	4.6	23.1
PS8	NA	VOC/HAP	4.0	20.2
PS9	NA	VOC/HAP	2.0	10.0
PS 10	NA	VOC/HAP	2.7	13.4
PS 11	NA	VOC/HAP	2.6	13.3
PS12	NA	VOC/HAP	4.6	22.9
PS13	NA	VOC/HAP	6.0	30.0
PS14	NA	VOC/HAP	4.4	22.0
DYE	NA	VOC/HAP	0.2	1.0
TC2-3	NA	VOC/HAP	3.3	16.7
TC2-4	NA	VOC/HAP	2.5	12.5
TC2-5	NA	VOC/HAP	1.9	9.6
2LB1	NA	VOC/HAP	0.6	3.0
2LB2	NA	VOC/HAP	0.6	3.0
2LB3	NA	VOC/HAP	1.0	5.0
2LB4	NA	VOC/HAP	< 0.2	< 1.0

Table 2				
EU#	Operational / Production Limit	Air Contaminant	Emission Limit	
			Monthly emissions (tpm)	Annual emissions¹ (tpy)
2LB5	NA	VOC/HAP	1.0	5.0
5X01	NA	VOC/HAP	1.0	5.0
PS4, PS7, PS8, PS10, PS11, PS12, PS13, PS14, DYE, TC2-3, TC2-4, TC2-5, 2LB3, 2LB5	outlet concentration at each oxidizer ≤ 20 ppm	organic HAP		
Facility Wide	NA	PM _{2.5}	1.0	6.4
		PM ₁₀	1.0	6.4
		SO ₂	0.08	0.5
		VOC ²	30.0	148.0
		Single HAP ²	10.0	50.0
		Total HAP ²	15.0	75.0
		Ozone	1.5	7.5
		Ammonia ³	1.5	7.5
		NO _x ⁴	7.1 ⁵	85.14 ⁶
		Opacity	0%	0%
		CO ⁴	11.8	70.56
		CO ₂	16,553.70	99,322 ⁷

Table 2 Key:

CO = Carbon monoxide
CO₂ = Carbon dioxide

EU = Emission Unit
HAP (single) = maximum single Hazardous Air Pollutant
HAP (total) = total Hazardous Air Pollutants.
NA = Not Applicable
NO_x = Nitrogen Oxides

PM_{2.5} = Particulate matter 2.5 micrograms or greater in size
SO₂ = Sulfur dioxide
Tpm = tons per month
Tpy = tons per year
VOC = Volatile Organic Compound
% = percent
< = less than

Table 2 Notes:

1. Annual emissions are calculated on a 12 month rolling basis
2. FLEXcon is taking a voluntary restriction on annual and monthly emission of VOC, combined HAP and individual HAP.
3. FLEXcon is taking a voluntary restriction on the facility-wide ammonia limit of 7.5 TPY resulting from the application of water based coatings.
4. NOx and CO emissions are generated from numerous fuel burning equipment including process ovens, boilers, space heaters, hot water heaters, roof top units, emergency generators and the regenerative thermal oxidizers. All of these units are exempt from the air quality plan approval process. The emissions are included in the facility wide emissions.
5. Monthly NOx emissions include the additional 0.13 from the new oven
6. Annual NOx emissions include several generators running at 300 hours each
7. Annual CO₂ emissions include several generators running at 300 hours each

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:

Table 3	
EU#	Monitoring and Testing Requirements
PS4 PS7 PS8 PS10 PS11 PS12 PS13 PS14 DYE TC2-3 TC2-4 TC2-5 2LB3 2LB5	<ol style="list-style-type: none"> 1. The Permittee shall calibrate the pressure transmitters on the oxidizers in accordance with the manufacturer's recommendations or at least every 6 months and conduct visual inspections of the pressure switches every month. 2. The Permittee shall maintain the air flows to the oxidizers at a sufficient flow rate as to maintain the stated control efficiency whenever VOC and HAP emissions are being generated by the various coating lines tied into the unit. In the event of insufficient airflow, a pressure switch will automatically shut the oxidizer and the coating lines off. 3. The Permittee shall continuously monitor the RTOs center bed combustion zone thermocouples and LEL measurements of inlet VOC exhaust, which are recorded electronically. RTO combustion chamber temperatures shall be continuously recorded to demonstrate that it is operating at or above the set point temperature required to maintain 99% destruction efficiency and 98% for the Plant 2 ABB. 4. The Permittee shall properly install, calibrate, maintain and operate monitoring systems to ensure continuous and accurate operations at all times. 5. The Permittee shall, at least every three months, inspect the RTOs parametric measurement monitoring and recording devices to ensure proper operation, calibration and that malfunctions are not occurring. These devices may include but not limited to the temperature recorder and enclosure pressure transducer.

Table 3	
EU#	Monitoring and Testing Requirements
PS4 PS7 PS8 PS10 PS11 PS12 PS13 PS14 DYE TC2-3 TC2-4 TC2-5 2LB3 2LB5	<p>6. The Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with §60.442(a)(2) for each thermal incineration destruction devices.</p> <p>7. In accordance with 40 CFR 60, Subpart RR-: Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations -New Source Performance Standards (“NSPS”) the Permittee shall:</p> <ul style="list-style-type: none"> a. pursuant to 40 CFR 60.442(a)(2)(i), demonstrate a 90 percent overall VOC emission reduction as calculated over a calendar month; b. pursuant to 40 CFR 60.444(c), determine the performance test of the solvent destruction device shall be determined by averaging the results of three test runs as specified in §60.8(f); c. pursuant to 40 CFR 60.445(e), shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5 °C; d. pursuant to 40 CFR 60.445(g), shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating.; and e. Determine the VOC concentration of each effluent gas stream entering and exiting the solvent destruction device pursuant to 40 CFR 60.446. <p>8. In accordance with 40 CFR 63, Subpart JJJJ-Paper and Other Web Surface Coating the Permittee shall:</p> <ul style="list-style-type: none"> a. Pursuant to 40 CFR 63.3350(e), install, operate, and maintain a Continuous parameter monitoring system (CPMS). b. Pursuant to 40 CFR 63.3350(f), conduct all capture system monitoring in accordance with the developed site-specific monitoring plan. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit. c. Pursuant to 40 CFR 63.3360(e) conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in paragraphs (e)(1) and (2) of this section. During the performance test, the Permittee shall establish the operating limits required by §63.3321 according to paragraph (e)(3) of this section; and d. Pursuant to 40 CFR 63.3360(f) determine capture efficiency using the procedures in paragraph (f)(1), (2), or (3) of this section, as applicable.
PS12, PS13	<p>9. The Permittee shall conduct stack testing as described in 40 CFR 63 subpart JJJJ and Table 6, item 1 for the purposes of verifying compliance with emission limits in Table 2 on the Durr located in Plant 5 within 180 days of the operation of the Durr RTO.</p>

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EU#	Monitoring and Testing Requirements																																																																											
PS4, PS7, PS8, PS10, PS11, PS12, PS 13, PS14, TC2- 3,TC2-4 TC2-5, DYE 2LB3 2LB5	10. The Permittee shall conduct performance and emission testing to determine the capture and destruction efficiency of the control systems and to determine compliance with the provisions of this Plan Approval and applicable federal requirements in accordance with the following schedule: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Line Number</th> <th style="text-align: center;">Plant Number</th> <th style="text-align: center;">RTO Name</th> <th style="text-align: center;">Testing Frequency (yr)</th> <th style="text-align: center;">Efficiency %</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">PS4</td><td style="text-align: center;">4</td><td style="text-align: center;">TANN</td><td style="text-align: center;">5</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">PS7</td><td style="text-align: center;">4</td><td style="text-align: center;">Alstom</td><td style="text-align: center;">NA</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">PS8</td><td style="text-align: center;">4</td><td style="text-align: center;">TANN</td><td style="text-align: center;">5</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">PS10</td><td style="text-align: center;">4</td><td style="text-align: center;">Alstom</td><td style="text-align: center;">NA</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">PS11</td><td style="text-align: center;">4</td><td style="text-align: center;">Alstom</td><td style="text-align: center;">NA</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">PS12</td><td style="text-align: center;">5</td><td style="text-align: center;">DURR</td><td style="text-align: center;">5</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">PS 13</td><td style="text-align: center;">5</td><td style="text-align: center;">DURR</td><td style="text-align: center;">5</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">PS14</td><td style="text-align: center;">5</td><td style="text-align: center;">ABB</td><td style="text-align: center;">NA</td><td style="text-align: center;">99</td></tr> <tr><td style="text-align: center;">DYE</td><td style="text-align: center;">2</td><td style="text-align: center;">ABB</td><td style="text-align: center;">5</td><td style="text-align: center;">98</td></tr> <tr><td style="text-align: center;">TC2-3</td><td style="text-align: center;">2</td><td style="text-align: center;">ABB</td><td style="text-align: center;">5</td><td style="text-align: center;">98</td></tr> <tr><td style="text-align: center;">TC2-4</td><td style="text-align: center;">2</td><td style="text-align: center;">ABB</td><td style="text-align: center;">5</td><td style="text-align: center;">98</td></tr> <tr><td style="text-align: center;">TC2-5</td><td style="text-align: center;">2</td><td style="text-align: center;">ABB</td><td style="text-align: center;">5</td><td style="text-align: center;">98</td></tr> <tr><td style="text-align: center;">2LB3</td><td style="text-align: center;">2</td><td style="text-align: center;">ABB</td><td style="text-align: center;">5</td><td style="text-align: center;">98</td></tr> <tr><td style="text-align: center;">2LB5</td><td style="text-align: center;">2</td><td style="text-align: center;">ABB</td><td style="text-align: center;">5</td><td style="text-align: center;">98</td></tr> </tbody> </table>	Line Number	Plant Number	RTO Name	Testing Frequency (yr)	Efficiency %	PS4	4	TANN	5	99	PS7	4	Alstom	NA	99	PS8	4	TANN	5	99	PS10	4	Alstom	NA	99	PS11	4	Alstom	NA	99	PS12	5	DURR	5	99	PS 13	5	DURR	5	99	PS14	5	ABB	NA	99	DYE	2	ABB	5	98	TC2-3	2	ABB	5	98	TC2-4	2	ABB	5	98	TC2-5	2	ABB	5	98	2LB3	2	ABB	5	98	2LB5	2	ABB	5	98
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2LB3	2	ABB	5	98																																																																								
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Facility-wide	11. If and when MassDEP requires it, the Permittee shall conduct emission Reference testing in accordance with USEPA Test Methods and Regulation 310 CMR 7.13. 12. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration 13. 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 14. At least 60 days prior to emission testing, the Permittee shall submit to MassDEP for approval, a stack emission pretest protocol 15. Within 60 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.																																																																											

Table 3 Key:

°C = degrees centigrade
 CMR= Code of Massachusetts Regulations
 EU# = Emission Unit Number

CFR= Code of Federal Regulations
 USEPA= United States Environmental Protection Agency
 RTO= Regenerative Thermal Oxidizer

HAP= Hazardous Air Pollutants
 dscm = Dry Standard Cubic Meter
 NA = Not Applicable

VOC= Volatile Organic Compounds
 ± = plus or minus

Table 4

EU#	Record Keeping Requirements
PS4 PS7 PS8 PS9 PS10 PS11 PS12 PS13 PS14 DYE TC2-3 TC2-4 TC2-5,2LB1, 2LB2 2LB3 2LB4, 2LB5 5X01	<ol style="list-style-type: none"> 1. In accordance with 40 CFR 60, Subpart RR-: Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations -New Source Performance Standards (“NSPS”) the Permittee shall: <ol style="list-style-type: none"> a. pursuant to 40 CFR 60.443(e), continuously record the destruction device combustion temperature (if using a control device) during coating operations and shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with 40 CFR §60.442(a)(2); b. pursuant to 40 CFR 60.445(a), shall maintain a calendar month record of all coatings used and the results of the reference test method specified in §60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings; c. pursuant to 40 CFR 60.445(d), maintain a 12 month record of the amount of solvent applied in the coating at the facility; and d. pursuant to 40 CFR 60.445(h), shall retain records of the measurements required in §§60.443 and 60.445 for at least two years following the date of the measurements. 2. The Permittee shall prepare and maintain daily records sufficient to demonstrate compliance consistent with the applicable averaging time stated in 310 CMR 7.18(2)(a). Records shall be maintained on site for five years from date of generation and shall be made available to representatives of the Department and EPA. Such records shall include but are not limited to: <ol style="list-style-type: none"> a. Identity, quantity, formulation, and density of coating(s) used b. Identity, quantity, formulation, and density of diluent(s) used c. Identity and quantity of gallons of clean up solvent(s) using a mass balance inventory system d. Solids content of any coating(s) used e. Actual operational and emissions characteristics of the coating line and any associated emissions capture and control equipment f. Quantity of product processed and g. Any other requirements specified by the Department in any approval(s) and/or order(s). 3. The Permittee shall track and record ozone emissions from the facility’s corona treaters monthly and on a 12 month rolling basis. 4. The Permittee shall track and record ammonia emissions monthly and on a 12 month rolling basis.

Table 4	
EU#	Record Keeping Requirements
Facility-Wide	5. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), pollution control devices (PCDs) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time work was completed.
	6. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates (i.e. in excess of permitted limits) on the approved EU(s), PCD(s), and monitoring equipment. At a minimum, the records shall include: <ol style="list-style-type: none"> a. Date and time the malfunction occurred b. Description of the malfunction c. Corrective actions taken d. The date and time corrective actions were initiated and completed e. The date and time emission rates and monitoring equipment returned to compliant operation.
	7. 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/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping
	8. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	9. The Permittee shall maintain a copy of this Plan Approval, the underlying Applications and the most up-to-date SOMP for the EU(s) and PCD(s) approved herein on-site.
	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:

EU# = Emission Unit Number
 SOMP = Standard Operating and Maintenance
 Procedure
 °C = Degrees Centigrade
 VOC = Volatile Organic Compound

PCD = Pollution Control Device
 USEPA = United States Environmental Protection
 Agency
 °F =Degrees Fahrenheit

Table 5	
EU#	Reporting Requirements
PS4 PS7 PS8 PS9 PS10 PS11 PS12 PS13 DYE PS14 TC2-3 TC2-4 TC2-5 2LB1 2LB2 2LB3 2LB4 2LB5 5X01	<ol style="list-style-type: none"> 1. In accordance with 40 CFR 60, Subpart RR-: Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations -New Source Performance Standards (“NSPS”) the Permittee shall: <ol style="list-style-type: none"> a. pursuant to 40 CFR 60.447(a), submit the performance test data and results from the performance test to the Administrator as specified in §60.8(a) of the General Provisions (40 CFR part 60, subpart A); b. pursuant to 40 CFR 60.447(b), following the initial performance test, submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in §60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually; and c. pursuant to 40 CFR 60.447(c), submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.443(e). If no such periods occur, the owner or operator shall state this in the report. Pursuant to 40 CFR 60.7, all reports shall be postmarked by the 30th day following the end of each six-month period. 2. In accordance with 40 CFR 63, Subpart JJJ-Paper and Other Web Surface Coating the Permittee shall: <ol style="list-style-type: none"> a. Pursuant to 40 CFR 63.3400(c), submit a semiannual compliance report according to paragraphs (c)(1) and (2) of this section; and. b. Pursuant to 40 CFR 63.3400(g), submit startup, shutdown, and malfunction reports as specified in §63.10(d)(5). 3. Within sixty (60) days of performing the compliance stack test, the Permittee shall supply MassDEP with a copy of the final report.
Facility-Wide	<ol style="list-style-type: none"> 4. 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). 5. The Permittee shall notify the Central Regional Office of MassDEP, BWP Permit Chief by telephone: 508-767-2845, email: CERO.Air@massmail.state.ma.us, or fax : 508-792-7621, as soon as possible, but no later than 3 business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within 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). . 6. The Permittee shall perform preventative maintenance on all corona treaters semi-annually 7. The Permittee shall notify MassDEP when a corona treater is being replaced or added. 8. The Permittee shall report annually 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. 9. 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.

Table 5 Key:

BWP = Bureau of Waste Prevention
 EU# = Emission Unit Number

CERO = Central Regional Office
 EPA = Environmental Protection Agency

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:

Table 6	
EU#	Special Terms and Conditions
PS4, PS7, PS8, PS9, PS10, PS11, PS12, PS13, DYE, PS14,TC2-3, TC2-4,TC2- 5,2LB1, 2LB2, 2LB3, 2LB4, 2LB5,5X01	1. In accordance with 40 CFR 63, Subpart JJJJ-Paper and Other Web Surface Coating the Permittee shall: <ol style="list-style-type: none"> a. Limit HAP emission using one of the four options listed at 40 CFR 63.3320. FLEXcon implements option four which states: If you use an oxidizer to control HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of not greater than 20 ppm by volume by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent, b. For the units that are using a control device, demonstrate compliance with 40 CFR 63 subpart JJJJ by installing and continuously operating the use of air pollution control equipment and Permanent Total Enclosure (PTE), c. Maintain a Site Specific Monitoring (SSM) Plan that describes how the Facility will document compliance with 40 CFR 63 subpart JJJJ. This plan must be maintained onsite and be updated annually, d. If controlling the line, ensure that the RTO is operated with a permanent total enclosure (100% capture efficiency), e. Utilize bypass stacks (to bypass the pollution control devices) for emergency purposes or when compliant coatings containing low-VOC/are being used. Compliant coatings are aqueous based solutions of polymer resins with less than 4% of VOC/HAP by weight (kg organic HAP/kg coating material), as applied, f. Utilize coatings that are compliant with 40 CFR 63.3370(n) and (o), g. The Permittee must continuously monitor and record when the air pollution control equipment is off line and bypassed due to an emergency and when compliant coatings are in use, h. For lines being controlled, ensure that the outlet organic HAP concentration at the RTO is ≤ 20 ppm, i. Operate and maintain source and control equipment consistent with good air pollution practices pursuant to 40 CFR 63.6(e)(1), j. Develop and implement a written start-up, shutdown, and malfunction plan (SSMP) for affected source and control equipment, k. For controlled lines, maintain a rolling 3-hour average combustion zone temperature at
PS4, PS7, PS8,	

Table 6	
EU#	Special Terms and Conditions
PS9, PS10, PS11, PS12, PS13, DYE, PS14,TC2-3, TC2-4,TC2- 5,2LB1, 2LB2, 2LB3, 2LB4, 2LB5, 5X01	<p>or above that demonstrated during the compliance test pursuant to 40 CFR 63.3350(e) and 63.3360(e)(ii),</p> <ol style="list-style-type: none"> 1. If using a control device, <ol style="list-style-type: none"> 1. Conduct the initial performance test within 180 days of control equipment start up pursuant to 40 CFR 63.7(a), 2. Notify the administrator of the test at least 60 days in advance pursuant to 40 CFR 63.7(b), 3. Development , and if requested, submittal of the test plan at least 60 days in advance of the test pursuant to 40 CFR63.7(c), 4. Performance tests shall be conducted under normal operating condition pursuant to 40 CFR 63.7(e), 5. Determine capture efficiency in accordance with applicable requirements. The Permittee may assume capture efficiency of 100% if the capture system is a permanent total enclosure (PTE). The Permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of Section 6 of EPA Method 204 of 40 CFR part 51, Appendix M and that all exhaust gases from the enclosure are delivered to a control device, 6. Develop a written Site Specific Monitoring Plan for the source, control system and monitoring system pursuant to 40 CFR 63.6(e)(3)(v). m. Maintain specified records for at least 5 years pursuant to 40 CFR 63.10(b)(1) and 63.10(b)(2). n. Maintain specified records for the facility’s Continuous Monitoring Systems (CMSs) pursuant to 40 CFR 63.10(c). o. Submit an initial notification within 1 year of the compliance date pursuant to 40 CFR 63.3400(b)(1). p. Submit a semi-annual compliance report pursuant to 40 CFR 63.3400(c). q. Submit performance test reports within 60 days of the completion of the test to the Administrator pursuant to 40 CFR 63.7(g) and 63.3400(f), and r. Submit all start-up, shutdown or malfunction reports to the Administrator pursuant to 40 CFR 63.3400(g).
PS4 PS7 PS8 PS10 PS11 PS12 PS13 DYE PS14 TC2-3 TC2-4 TC2-5 2LB3,2LB5	<ol style="list-style-type: none"> 2. The Permittee shall: <ol style="list-style-type: none"> a. Calibrate the pressure transmitters on the oxidizers in accordance with the manufacturer’s recommendations or at least every 6 months and conduct visual inspections of the pressure switches every month. b. Maintain the air flows to the oxidizers at a sufficient flow rate as to maintain the stated control efficiency whenever VOC/HAP emissions are being generated by the various coating lines tied into the unit. In the event of insufficient airflow, a pressure switch will automatically shut the oxidizer and the coating lines shut down. c. Ensure that continuous monitoring of the thermal oxidizers shall include a combustion zone thermocouple and LEL measurement of inlet VOC exhaust, which are recorded electronically. Thermal oxidizers combustion chamber temperatures shall be continuously recorded to demonstrate that it is operating at or above the set point temperature required to maintain the following percent of destruction efficiency for each oxidizer: <ol style="list-style-type: none"> i. Plant 2 ABB = 98%,

Table 6	
EU#	Special Terms and Conditions
PS4 PS7 PS8 PS10 PS11 PS12 PS13 DYE PS14 TC2-3 TC2-4 TC2-5 2LB3 2LB5	ii. Plant 4 Alstom = 99%, iii. Plant 4 TANN = 99% , iv. Plant 5 ABB = 99%. v. Plant 5 DURR = 99% d. Properly install, calibrate, maintain, and operate the systems used for such monitoring to ensure continuous and accurate operations at all times , and e. Inspect the RTOs parametric measurement monitoring and recording devices to ensure proper operation, calibration and that malfunctions are not occurring at least every three months. These devices may include but not limited to the temperature sensor (thermocouple), temperature recorder/ readout and pressure sensor /gauge/transducer.
	3. The Permittee shall ensure that the RTO has reached operating temperatures sufficient to obtain stated control efficiencies before the lines are allowed to apply coatings containing volatile organic compounds.
PS9	4. The Permittee shall run only water based coatings which are defined as coatings consisting of aqueous solutions of polymer resins with less than 4 percent VOC/HAP by weight.
PS10 PS11 PS12 PS13 PS14	5. In accordance with 40 CFR 63.3350, the Permittee must record parameters related to possible air pollution control equipment bypass and coating use on lines that are “intermittently- controlled workstation” or have the ability to run controlled or uncontrolled. The Permittee must continuously record the position of the damper: when it is in the water mode (bypass stack in use) or in the solvent mode (when the oxidizer is in use).
PS7 PS10 PS11	6. Alternative Operating Scenario for the Plant 4 Alstom oxidizer: The Permittee shall run both beds of the Plant 4 Alstom oxidizer under full load conditions and have the ability to run a single bed under low load conditions. Low load condition is defined as running 1 or 2 machines while full loading is defined as 3 or more machines.
Facility Wide	7. This Plan Approval, X269135, supersedes Plan Approval X268753; with the exception that all plan application materials submitted as part of the previous Plan Approvals become part of this Plan Approval, X269135.

Table 6 Key:

CFR = Code of federal regulation	Kg = kilogram
CMR = Code of Massachusetts regulation	TPY = tons per consecutive 12-month period
EU# = Emission Unit Number	VOC = Volatile Organic Compounds
HAP = Hazardous Air Pollutant	% = percent
RTO = Regenerative Thermal Oxidizer	= Less than or equal to
ppm = Parts per million	LEL = Lower Explosive Limit
PTE = Permanent Total Enclosure	SSM = Site Specific Monitoring
SSMP = Start-Up, Shutdown, And Malfunction Plan	

- 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 listed in Table 7 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 Tables 7 and 7A, for the Emission Units that are regulated by this Plan Approval.

Table 7				
EU#	Stack Height Above Roof (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
PS4	20	2.3	25	50-400
PS7	20	4.3	25	50-400
PS8	25	2.33	28-52	200-250
PS9	20	1.8 x 1.7	25	50-400
PS9	20	2.2 x 1.9	25	50-400
PS10	20	4.3	25	50-400
PS11	20	4.3	25	50-400
PS12	10	4.5	29-33	200-300
PS13	10	4.5	29-33	200-300
DYE	20	4.3	17	150-400
PS14	15	6.3	42	75-520

Table 7				
EU#	Stack Height Above Roof (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
TC2-3	20	4.3	17	150-400
TC2-4	20	4.3	17	150-400
TC2-5	20	4.3	17	150-400
2LB5	20	4.3	17	150-400
2LB1	10	1.2	17	150-400
2LB2	10	0.8	17	150-400
2LB3	20	4.3	17	150-400
2LB4	10	1.5	17	150-400
2S01	20	4.3	17	150-400
5X01	15	3.1	42	75-520

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

Table 7 A Corona Treater Stacks						
EU #	Stack Height above ground (feet)	Stack Height above roof (feet)	Stack Exit Diameter (feet)	Exhaust Gas Exit Temperature (°F)	Exhaust Gas Exit Velocity Range (feet per second)	Stack liner Material
PS4(primary)	40	10	0.5	ambient	60	Stainless steel
PS4 (secondary)	40	10	0.5	ambient	25.8	PVC
PS7	40	10	0.5	ambient	24.7	PVC
PS8	40	10	0.5	ambient	77.2	PVC
PS9	40	10	0.83	ambient	45.7	Stainless steel
PS10	40	10	0.5	ambient	25	PVC
PS11	40	10	0.5	ambient	37.5	PVC
PS12	45	10	0.5	ambient	60.5	PVC
PS13 (primary)	48.5	35	0.5	ambient	49.6	PVC
PS13 (secondary)	45	10	1.0	ambient	26	Stainless steel
PS14	45	10	1.2	ambient	33.3	Stainless steel
5X01	45	10	0.5	ambient	84.6	PVC
TC2-3	35	10	0.5	ambient	44.4	PVC
TC2-4	35	10	0.5	ambient	41.1	PVC
TC2-5(primary)	35	10	0.5	ambient	32.7	PVC
TC2-5 (bottom)	35	10	0.5	ambient	36.25	PVC
TC2-5(top)	35	10	0.5	ambient	36.25	PVC
2LB2 (primary)	35	10	0.5	ambient	25.5	Stainless steel
2LB2 (secondary)	35	10	0.4	ambient	19.6	Stainless steel
2LB4	35	10	0.66	ambient	24.3	Stainless steel
2S01	35	10	0.5	ambient	84.6	PVC
2LB5 (primary)	35	10	0.66	ambient	25.7	Stainless steel
2LB5 (secondary)	35	10	0.5	ambient	25.5	Stainless steel

Table 7 A Key:

EU#= Emission Unit number

PVC= polyvinyl chloride

°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 a 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.

Roseanna E. Stanley
Permit Chief
Bureau of Air and Waste

Enclosure
Adjudicatory Hearing Fee Transmittal Form

Ecc: Spencer Board of Health
Spencer Fire Department
MassDEP/Boston - Yi Tian
Kim McCoy, MassDEP, Worcester, MA

Appendix A

Summary of Changes addressed in Plan Approval TR#X255579

- Ozone emission limits. FLEXcon operates 23 corona treaters which have the potential to emit (“PTE”) 40.64 tons per year of ozone based on the units running full time all year (8,760 hours/year). This full time operation of corona treaters is not realistic. FLEXcon voluntarily restricted the facility-wide ozone limit of 7.5 TPY. This restriction is achievable with permit conditions related to monitoring, tracking, routine scheduled maintenance, and reporting.
- Ammonia emissions limits. Although the PTE for ammonia is 34.84 tons per year, the actual emissions have been considerably lower. FLEXcon voluntarily restricted the facility-wide ammonia limit of 7.5 TPY resulting from the application of water based coatings.
- Nitrogen oxide (NOx) emissions. Facility wide NOx emissions include the emissions from the air pollution control units, process ovens, two (2) boilers and five (5) emergency generators. These emissions are included in the facility-wide NOx limits.
- Opacity limits. The opacity limits were changed to be consistent throughout the facility.
- VOCs and HAPs short term emission limits. Short term emission limits for VOCs and HAPs were assigned to all emission units (“EU”) and further restriction on the facility wide VOC and HAP emissions were set.
- Production limits. The production limits were eliminated from the Plan Approval as the emissions are controlled by Pollution Control Devices (“PCDs”).
- Federal Requirements. 40 CFR 60, Subpart RR and 40CFR 63, Subpart JJJJ. Requirements were incorporated into this Plan Approval at the Facility’s request.
- Consolidation of old Plan Approvals. Plan Approval X255579 consolidated all previously issued Plan Approvals into one. See Table A below.

Best Available Control Technology (“BACT”) had already been established for the production equipment in the original air quality Plan Approvals and is not changing. **All previously issued Plan Approvals listed in Table A were superseded by this Plan Approval** with the exception that all plan application materials submitted as part of the previously issued Plan Approvals, and the BACT established therein, became part of Plan Approval X255579.

- Reassignment of emission unit (“EU”) numbers. The original EU numbers were updated to match the Facility’s current designation. See Table B below.

The following Table identifies the air quality Plan Approvals that were consolidated under Plan Approval Tr #X255579.

Table A List of Plan Approvals		
Transmittal Number	Date of Air Plan Approval	In Regards to:
X255579	May 30, 2014	Consolidating air quality approvals
X234562	July 6, 2011	Coater in Plant 2 (2LB5)
X234326	January 4, 2011	Relocation of PS 4 coater and addition of new TANN regenerative thermal oxidizer
X227790	November 4, 2009	Installation or Modification of four coating machines: 2LB1, 2LB2, 2LB3, 5X01
W201278	April 15, 2008	Coating Line and oven (5X01)
W088174	February 13, 2007	Installation of a new oven for coating line TC2-5 and an increase of the application coating rate
W045640	February 1, 2005	Amended Approval for PS7, 8, 10, 11, 12, 13 & DYE
W029171	December 5, 2002	Addition of Top Coaters
109961	July 15, 1997	Installation of PS 14
CM-87-IF-023	May 22, 1997	Installation of PS 9
131714	March 19, 1997	Installation of new RTO at Plant 2
C-P-89-008	September 4, 1990	Installation of PS12 and PS13
CM-87-IF-001	February 23, 1988	Installation of PS10 and PS11
CM-83-IF-036	February 28, 1986	Installation of PS 8
CM-82-IF-045	February 28, 1986	Installation of PS 7

The following Emission Unit Reassignment Table identifies the old emission units, the current emission unit identifiers and where it is located.

Table B Emission Unit Reassignment		
Old Emission Unit Identifier	Current Emission Unit Identifier	Plant Location
2	PS4	4
8	PS7	4
9	PS8	4
10	PS9	4
11	PS10	4
12	PS11	4
13	PS12	5
14	PS13	5
15	DYE	2
16	PS14	5
18	TC2-3	2
19	TC2-4	2
20	TC2-5	2
21	2LB5	2
2LB1	2LB1	2
2LB2	2LB2	2
2LB3	2LB3	2
NA	2LB4	2
NA	2S01	2
5-1	5X01	5
NA	PW 1 & 2	4
NA	B1	5
NA	B2	2
NA	E1-E4	One each in McDonough building, Plants 3, 4 &5
NA	E5	Technology Center