



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

October 6, 2016

Mr. James Boyle
Majilite Manufacturing, Inc.
1530 Broadway Road
Dracut, MA 01826

RE: DRACUT
Transmittal No.: X271411
Application No.: NE-16-010
Class: *SM79-7*
FMF No.: 360502
AIR QUALITY PLAN APPROVAL

Dear Mr. Boyle:

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 proposed installation and operation of a pilot-scale coating line at your coating facility located at 1530 Broadway Road in Dracut, 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

Majilite Manufacturing, Inc. (“Permittee”) proposes to install a pilot-scale web coating line (Emission Unit No. 10) whose purpose will be to support the existing Casting Line by running the color matching tasks and some research and development (R&D) work. The Permittee is seeking to relieve the Casting Line of the expensive color matching duties by moving those duties to a smaller, less expensive line to operate. The new Matex Labo-Wet coater will consist of a Matex roll application station and a drying oven. This coater will be referred to as the “Pilot Line”, which will possess a maximum coating width of approximately 30 inches. The Permittee states that this line is not intended for production purposes but is perfectly suited to be used in a supporting role. It stands approximately 6 feet high and is approximately 12 feet long. The maximum rated line speed is 2.3 square meters per minute. The coatings to be used are those coatings that have already been approved for the Facility’s other existing coating lines. Supplemental forms for these coatings have already been submitted and approved. The proposed Unit No. 10 will be equipped with a variety of functional stations to accommodate R&D activities.

The Permittee is proposing two operating modes for Emission Unit No. 10. The first is production support, typically conducted when the Facility’s Casting Line is in operation from Mondays through Thursdays. (Please take note that an associated thermal oxidizer shall always be in operation whenever the Casting Line is in operation.) The second operating mode is for R&D only, which would take place only when the Casting Line is not in operation.

The Permittee currently operates under the following active approvals:

List of Active Approvals

Issuance Date	Transmittal No.	Approval No.	Subject Equipment
February 5, 2005	W007594	MBR-99-IND-035	Casting Line, Finishing Line and Mix Room
November 2, 2009	X229477	MBR-09-IND-013	Pigment Room
February 18, 2011	X235999	MBR-10-IND-023	Low VOC Coater

Applicable Regulatory Requirements

40 CFR 60, Subpart VVV

This subpart applies to each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. Any affected facility for which the amount of volatile organic compounds (VOC) used is less than 95 Megagrams (Mg) per 12-month period is subject only to the requirements of §§60.744(b), 60.747(b), and 60.747(c), incorporated herein.

Review of potential coating usage finds that the Permittee will also be subject to and will comply with the requirements of 310 CMR 7.18(15)(a) for EU 10 whenever the thermal oxidizer is in operation. In this scenario, the Permittee will comply with the emission limit of 4.8 pounds of VOC emitted per gallon of solids applied by directing the coating exhaust to the existing thermal oxidizer which controls the emissions from the Casting Line.

2. EMISSION UNIT (EU) IDENTIFICATION

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

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
EU 10	Matex Labo-Wet Pilot Coater	2.3 square meters per minute with a web width of approximately 30 inches	Thermal Oxidizer (during production mode)
			N/A (during R&D mode)

Table 1 Key:

EU# = Emission Unit Number
 N/A = Not Applicable

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. The Permittee has requested to maintain the current facility-wide cap on VOC and HAP emissions from its last plan approval, MBR-10-IND-023, dated February 18, 2011.

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit (After Control)
EU 10	Whenever the thermal oxidizer is in operation, the process gas from EU 10 shall also be directed to the thermal oxidizer for control. VOC emissions shall be less than 15 pounds per day when the oxidizer is not in operation.	VOC	0.4 TPM 0.4 TPY
		Individual HAP	0.1 TPM 0.4 TPY
		Total HAP	0.1 TPM 0.4 TPY
Facility-wide ^a	N/A	VOC	9.9 TPM 33.6 TPY
		Individual HAP	3.5 TPM 9.8 TPY
		Total HAP	7.0 TPM 23.8 TPY

Table 2 Key:

- EU# = Emission Unit Number
- R&D = research and development
- VOC = Volatile Organic Compounds
- Individual HAP = Maximum single Hazardous Air Pollutant
- Total HAP = Total Hazardous Air Pollutants
- N/A = Not Applicable
- TPM = Tons per month
- TPY = Tons per twelve month rolling period
- ^a = The Permittee is maintaining the same Facility-wide emission limits that were previously established

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
EU 10	1. The Permittee shall monitor the amount of inks, coatings, adhesives, solvents and clean-up solutions used on this EU on a daily, monthly, and twelve month rolling basis.
	2. The Permittee shall monitor the VOC and HAP content of all inks, coating, adhesives, solvents and clean-up solutions used on this EU.
	3. The Permittee shall comply with all applicable monitoring requirements associated with 40 CFR 60.740(b). The Permittee has projected VOC usage to be less than 95 Mg per 12-month rolling period. As long as VOC usage is within this threshold set by the USEPA, the Permittee is only subject to the monitoring requirements of 40 CFR 60.744(b). As required by 60.744(b), the Permittee shall: (1) Make semi-annual estimates of the projected annual amount of VOC to be used for the manufacture of polymeric coated substrate at the affected coating operation in that year; and (2) Maintain records of actual VOC use.
Facility-	4. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	5. 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	
EU#	Monitoring and Testing Requirements
wide	6. At least 30 days prior to emission testing, the Permittee shall submit to MassDEP for approval a stack emission pretest protocol.
	7. Within 45 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.

Table 3 Key:

EU# = Emission Unit Number
 CMR = Code of Massachusetts Regulations
 CFR = Code of Federal Regulations
 USEPA = United States Environmental Protection Agency

VOC = Volatile Organic Compounds
 HAP = Hazardous Air Pollutants
 MassDEP = Massachusetts Department of Environmental Protection
 Mg = Megagrams

Table 4	
EU#	Record Keeping Requirements
EU 10	1. The Permittee shall maintain records of the consumption of VOC-and HAP-containing materials on a daily, monthly, and twelve month rolling basis.
	2. The Permittee shall maintain records of the VOC-and HAP content of all VOC and HAP-containing materials.
	3. The Permittee shall comply with all applicable monitoring requirements associated with 40 CFR 60.740(b). The Permittee has projected VOC usage to be less than 95 Mg per 12-month rolling period. As long as VOC usage is within this threshold set by the USEPA, the Permittee is only subject to the recordkeeping requirements of 60.747(c)(1). As required by 60.747(c)(1), the Permittee shall: Record semiannual estimates of projected VOC use and actual 12-month VOC use.
	4. The Permittee shall maintain records of the inspection and maintenance activities performed on the subject EU. The records shall include, at a minimum, the type or a description of the inspection and/or maintenance activities performed and the date and time the work was completed.

Table 4	
EU#	Record Keeping Requirements
	5. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. The Permittee shall record and maintain records of the VOC and HAP usage as well as the actual emissions of air contaminant(s) emitted for each calendar month, and each consecutive twelve month period (current month plus prior eleven months). In addition, the Permittee shall record and maintain records of the actual uncontrolled VOC emissions that take place on all days that the thermal oxidizer is not in operation. 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 .
	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 EU 10 on-site.
EU 10	8. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU, 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 the commencement of construction and date of initial start-up.
	10. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU 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.
Facility-wide	11. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	12. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	13. 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
 VOC = Volatile Organic Compounds
 HAP = Hazardous Air Pollutants
 Mg = Megagrams
 SOMP = Standard Operating and Maintenance Procedure

CMR = Code of Massachusetts Regulations
CFR = Code of Federal Regulations
MassDEP = Massachusetts Department of
Environmental Protection
USEPA = United States Environmental Protection
Agency

Table 5	
EU#	Reporting Requirements
EU 10	<p>1. The Permittee shall comply with all applicable monitoring requirements associated with 40 CFR 60.740(b). The Permittee has projected VOC usage to be less than 95 Mg per 12-month rolling period. As long as VOC usage is within this threshold set by the USEPA, the Permittee is only subject to the reporting requirements of 60.747(c)(2), (3).</p> <p>As required by 60.747(b), the Permittee shall: submit to the Administrator, and MassDEP, with the notification of anticipated startup required under §60.7(a)(2) of the General Provisions, a material flow chart indicating projected VOC use. The owner or operator shall also submit actual VOC use records at the end of the initial year.</p> <p>As required by 60.747(c)(2), (3), the Permittee shall: (2) Report the first semiannual estimate in which projected annual VOC use exceeds the applicable cutoff; and (3) Report the first 12-month period in which the actual VOC use exceeds the applicable cutoff.</p>
Facility-wide	<p>2. 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).</p> <p>3. The Permittee shall notify the Northeast Regional Office of MassDEP, BAW Permit Chief by telephone at 978-694-3200, email, nero.air@state.ma.us or fax 978-694-3499, as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to the Permit Chief at MassDEP within three (3) 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).</p> <p>4. The Permittee shall report every three years to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.</p> <p>5. 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.</p> <p>6. 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.</p> <p>7. 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.</p>

Table 5 Key:

EU# = Emission Unit Number

Mg = Megagrams
 CFR = Code of Federal Regulations
 BAW = Bureau of Air and Waste
 CMR = Code of Massachusetts Regulations
 MassDEP = Massachusetts Department of Environmental Protection

4. SPECIAL TERMS AND CONDITIONS

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

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

Table 6	
EU#	Special Terms and Conditions
EU 10	<ol style="list-style-type: none"> 1. The Permittee shall install a damper system capable of directing the exhaust from EU 10 to the thermal oxidizer (TOx) whenever the TOx is in operation and through an alternate stack designated in Table 7 below when the TOx is not in operation. 2. The Permittee shall only allow qualified personnel that have been properly trained to have access to the keys and password protection to switch the damper position to the alternate stack position on the control panel of the drying oven for this EU in order to allow venting of the uncontrolled VOC emissions directly to atmosphere. Actual VOC emissions shall be monitored and recorded for each day that the TOx is not in operation. The uncontrolled VOC emission rate shall not exceed 15.0 pounds per day. 3. Prior to switching to the alternate stack position, a qualified person which has been properly trained shall verify from previous day records that the Pilot Line oven had been properly purged of VOC containing material through the thermal oxidizer in the previous day. 4. Whenever the TOx is in operation, all coatings used on EU 10 shall contain no more than 4.8 pounds of VOC per gallon of solids, as applied after controls. Records shall be maintained to document this requirement. 5. The Permittee shall install a flow monitor and recorder to verify whether the process air from EU 10 is directed to the oxidizer or the alternate exhaust stack. The recorder shall also indicate the time, date, direction of flow, and whether the oxidizer is in operation. 6. The Permittee shall install an interlock system to ensure that the exhaust damper position is set for the proper mode and that the process air from EU 10 is vented to the thermal oxidizer whenever the oxidizer is in operation.

Table 6	
EU#	Special Terms and Conditions
	7. The Permittee shall develop and submit a Standard Operating Procedure (SOP) to MassDEP for review and approval within ninety (90) days on installing the equipment listed in Special Condition Nos. 6 and 7 above. At a minimum, the SOP shall identify specific procedures to ensure that EU 10 complies with the conditions contained in Tables 2 through 6.
Facility-wide	8. This Final Approval does not negate the responsibility of owner/operator of the referenced facility to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this approval imply compliance with any other applicable federal, state or local regulation now or in the future.
	10. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.

Table 6 Key:

EU# = Emission Unit Number
 CMR = Code of Massachusetts Regulations
 R&D = research and development

- 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:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
EU 10 (oxidizer stack)	50	4.67	15 – 35	150 - 550

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
EU 10 (alternate stack)	30	1	15 - 30	80 - 150

Table 7 Key:

EU# = Emission Unit Number
°F = Degree Fahrenheit
R&D = research and development

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.

Should you have any questions concerning this Plan Approval, please contact Mun Wong by telephone at 978-694-3286, 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.

Mun S. Wong
Environmental Engineer
Bureau of Air and Waste

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.

Susan P. Ruch
Deputy Regional Director &
Acting Permit Chief
Bureau of Air and Waste

Enclosure

cc: Board of Health, 11 Spring Park Avenue, Dracut, MA 01826
Fire Headquarters, 156 Pleasant Street, Dracut, MA 01826
Mr. Paul Murphy, CAAssociates, 16 Revolutionary Road, Acton, Massachusetts 01720-3830

Ecc: MassDEP/Boston - Yi Tian, MassDEP/NERO – Edward Braczyk, Martha Bolis, Mary Persky