



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Minor Modification to an AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("Department" or "MassDEP") pursuant to its authority under M.G.L. c. 111, §142B and §142D, 310 CMR 7.00 et seq., and in accordance with the provisions of 310 CMR 7.00: Appendix C.

ISSUED TO ["the Permittee"]:

Interprint, Inc.
101 Central Berkshire Boulevard
Pittsfield, MA 01201

INFORMATION RELIED UPON:

Application No. 1-O-08-006
Transmittal No. W204293
OP Minor Modification #WE-14-021;
Transmittal # X259759

FACILITY LOCATION:

Interprint, Inc.
101 Central Berkshire Boulevard
Pittsfield, MA 01201

FACILITY IDENTIFYING NUMBERS:

AQ ID: 1170013
FMF FAC NO.: 414411
FMF RO NO.: 430714

NATURE OF BUSINESS:

Commercial Gravure Printing

Standard Industrial Classification (SIC): 2754
North American Industrial Classification System (NAICS):323111

RESPONSIBLE OFFICIAL:

Name: Roland M. Morin
Title: Managing Director

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This Operating Permit shall expire on November 2, 2017.

For the Department of Environmental Protection, Bureau of Waste Prevention

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.

11/25/14

Michael Gorski
Regional Director
Department of Environmental Protection

Date

Western Regional Office

TABLE OF CONTENTS

Section	Special Conditions for Operating Permit	Page No.
1	Permitted Activities and Description of Facility and Operations	3
2	Emission Unit Identification – Table 1	8
3	Identification of Exempt Activities – Table 2	9
4	Applicable Requirements	
	A. Operational and/or Production Emission Limits and Restrictions – Table 3a, 3b, 3c	10-13
	B. Compliance Demonstration	
	- Monitoring and Testing Requirements – Table 4a,4b,4c, 4d	14-17
	- Record Keeping Requirements - Table 5a,5b,5c, 5d, 5e	18-22
	- Reporting Requirements – Table 6a,6b,6c	23-25
	C. General Applicable Requirements	26
	D. Requirements Not Currently Applicable -Table 7	26
5	Special Terms and Conditions – Table 8a,8b,8c, 8d, 8e, 8f	27-32
6	Alternative Operating Scenarios	33
7	Emissions Trading	33
8	Compliance Schedule	33
Section	General Conditions for Operating Permit	Page No.
9	Fees	34
10	Compliance Certification	34
11	Noncompliance	35
12	Permit Shield	35
13	Enforcement	36
14	Permit Term	36
15	Permit Renewal	36
16	Reopening for Cause	37
17	Duty to Provide Information	37
18	Duty to Supplement	37
19	Transfer of Ownership or Operation	37
20	Property Rights	37
21	Inspection and Entry	38
22	Permit Availability	38
23	Severability Clause	38
24	Emergency Conditions	38
25	Permit Deviation	39
26	Operational Flexibility	40
27	Modifications	40
28	Ozone Depleting Substances	40
29	Prevention of Accidental Releases	42
Section	Appeal Conditions for Operating Permit	43

SPECIAL CONDITIONS FOR OPERATING PERMIT

1. PERMITTED ACTIVITIES

In accordance with the provisions of 310 CMR 7.00:Appendix C and applicable rules and regulations, the Permittee is authorized to operate air emission units as shown in Table 1 and exempt, and insignificant activities as described in 310 CMR 7.00:Appendix C(5)(h) and (i). The units described in Table 1 are subject to the terms and conditions shown in Sections 4, 5, and 6 and to other terms and conditions as specified in this Permit. Emissions from the exempt activities shall be included in the total facility emissions for the emission-based portion of the fee calculation described in 310 CMR 4.00 and this Permit.

A. DESCRIPTION OF FACILITY AND OPERATIONS – (Non-Exempt Activities)

This operating permit has been modified to incorporate a second electron beam (EB) coating system, identified as Emission Unit #9, and a corona surface treatment device with a catalytic ozone eliminator, identified as Emission Unit #10.

Emission Unit #9 consists of a Faustel MCL 3 Roll Offset Gravure Coater and an EB curing unit which is comprised of an ESI EZcure I Model 125/60/750 with a Selfshield Model SF 125/750. The EB coating system has a maximum coating width of 0.6 meters with a maximum run speed of 200 meters of printed oriented polypropylene (OPP) film per minute. The offset gravure coater applies an EB coating to the OPP film that has been printed by the existing Giave/5E-700 Rotogravure Lab Press, also known as Lab Press 3. Cleanup solvents, which contain volatile organic compounds, are applied to the equipment by hand using rags. The EB coating system operates pursuant to Plan Approval #WE-14-002, issued 6/6/14, and is subject to the BACT requirements of 310 CMR 7.02(8)(a)2.

Emission Unit #10 consists of a Corotec UNI-50 with a Corotec Nozone System that is in-line with Lab Press 3. The purpose of the corona surface treatment device is to remove oils from and increase the surface tension of the substrate which enhances the adhesion of inks. The Corotec UNI-50 emits ozone which is controlled by the Corotec Nozone System. The Corotec Nozone System is a catalytic ozone decomposer used to convert ozone in the air stream to oxygen. The unit is designed to reduce input ozone levels up to 300 parts per million mass basis to less than 0.1 parts per million mass basis at the outlet. Therefore, the Corotec UNI-50 with a Corotec Nozone System is exempt from the plan approval requirements of 310 CMR 7.02 since it is subject to and complies with the requirements of 310 CMR 7.03(21).

Interprint designs and prints decorative paper used as the design layer in laminate surfaces such as countertops, flooring, furniture, and store fixtures. Interprint began operation at their existing facility on Central Berkshire Boulevard in the summer of 2005. Interprint operates three primary sources of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions at their facility which are the production printing presses and associated electron beam coater, lab printing presses and laminating process which are described in the following paragraphs. Other air contaminant sources at the facility which have applicable requirements are the hard chromium

electroplating process and the 33 kilowatt propane-fired emergency generator. Interprint has restricted their annual facility-wide VOC and HAP emission rates to below major source thresholds.

The facility is currently not a major source since it does not have the potential to emit major quantities of any applicable air contaminant. Additionally, the facility established emission caps to limit the facility-wide emissions of VOCs, any combination of HAPs and any single HAP in Plan Approval 1-P-11-008, issued September 29, 2011. However, the USEPA had determined prior to the establishment of the facility-wide VOC and HAP emission limits contained in the September 2011 plan approval that the facility was a major source under the National Emission Standards for Hazardous Air Pollutants (NESHAPs) and "once in always in". By being a major source under the NESHAPs, Interprint is subject to the Operating Permit and Compliance Program pursuant to 310 CMR 7.00: Appendix C(2).

Production Printing Presses

Interprint operates five (5) production rotogravure printing presses for production purposes using water-based inks which contain VOCs and HAPs. This printing operation is considered product and packaging rotogravure printing. The production printing presses operate pursuant to Plan Approval #1-P-11-008, dated 9/29/11 and are subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry), the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. and 310 CMR 7.00: Appendix A.

The printing lines are each equipped with drying ovens which fire propane at a maximum heat input capacity of 3.17 million British thermal units per hour (MMBtu/hr) for Machine 1 (M-1), 3.17 MMBtu/hr for Machine 2(M-2), 3.17 MMBtu/hr for Machine 3(M-3), 5.89 MMBtu/hr for Machine 4(M-4) and 12.7 MMBtu/hr for Machine 6(M-6). Any fuel burning equipment ≥ 3 MMBtu/hr heat input will be subject to the requirements of 310 CMR 7.04(4)(a) Inspection, Maintenance and Testing.

Emissions from each of the production printing presses vent to two emission points.

Lab Printing Presses

Interprint operates three (3) lab rotogravure printing presses that are used to perform design development of decorative prints and are infrequently used for production purposes. The lab printing presses are used to produce approximately 0.1% of the printed product made at the facility and are otherwise used to conduct research into new products. As a result, the lab printing presses are considered to qualify as research and laboratory equipment. 40 CFR Part 63, Subpart KK does not apply to research or laboratory equipment [63.820(b)], which is defined as:

Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Since the lab printing presses are used to make only a de minimis amount of product for sale, the

three lab printing presses meet the definition of research or laboratory equipment and are not subject to 40 CFR Part 63, Subpart KK. However, the lab presses operate pursuant to Plan Approval #1-P-11-008, dated 9/29/11, Plan Approval #1-P-11-013, dated 10/26/11 and are subject to the BACT requirements of 310 CMR 7.02(8)(a)2. and 310 CMR 7.00 Appendix A.

Lab Printing Press #2; Kochsiek Model No. 88, which was approved in Plan Approval #1-P-11-008, was replaced with a similar lab press (Lab Printing Press #4; Kochsiek Model No. 212H) pursuant to Plan Approval #1-P-11-013, dated 10/26/11.

Lab press machine 1(L-1) is equipped with a drying oven that is heated by a propane-fired hot oil system with a maximum 1.5 MMBtu/hr heat input rating. Lab press machine 3 and 4 (L-3 and L-4) are each equipped with drying ovens that are heated with propane at a maximum heat input capacity of 1.28 MMBtu/hr and 1.5 MMBtu/hr. Each lab printing press vents to its own stack.

Laminating Process

In the laminating process, samples of printed paper are laminated as part of the quality control process to check the color and design of customers' final products. The size of the typical printed sample ranges from 12 inch (in.) by 12 in. to 20 in. by 20 in. Individual samples of printed paper are laminated in a non-continuous, batch process. The laminating process equipment consists of six laminating presses and three electric drying ovens. Four of the laminating presses are heated by a 1.5 MMBtu/hr propane-fired hot oil system which is also used for the drying oven on Lab Press 1. The other two laminating presses are heated electrically. The laminating process operates pursuant to Plan Approval #1-P-11-008, dated 9/29/11 and is subject to the BACT requirements of 310 CMR 7.02(8)(a)2. and 310 CMR 7.00:Appendix A.

Hard Chromium Electroplating Process

Interprint conducts hard chromium electroplating of cylinders used on rotogravure printing lines. The process involves four tanks: a chromium stripping tank, a degreasing tank, a chromium electroplating tank, and a polishing tank. The chromium electroplating tank has a rectifier capacity of 13,000 ampere, and is vented first to a mist eliminator and then to a multi-stage composite mesh pad (CMP) with a final stage HEPA filter. The chromium electroplating operation is considered a large, hard chromium electroplating operation. The chromium electroplating operation was constructed and operated prior to the facility establishing caps to formally limit HAP emissions to below major source thresholds and prior to the first substantive requirement of the NESHAP. Therefore, the chromium electroplating tank is considered by EPA to be located at a major source of HAP and subject to the regulations at 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).

Pursuant to 40 CFR 63.340(c), process tanks associated with a chromium electroplating process, but in which chromium electroplating does not take place, are not subject to Subpart N. Therefore, the chromium stripping, degreasing and polishing tanks are not part of the affected source; only the chromium electroplating tank is subject to Subpart N.

In accordance with 40 CFR Part 63 Subpart N, the facility conducted an initial performance test on December 20, 2006. The stack test results for the chromium electroplating tank were

submitted in a report dated January 29, 2007 and indicated a chromium emission rate of 0.0005 milligram per dry standard cubic meter (mg/dscm), which is less than the allowable emission rate of 0.015 mg/dscm. In addition, the facility established a process operating parameter for the CMP which was a pressure drop of 2.7 inches of water column across all the stages. A pressure drop across the mist eliminator was established at 0.4 inches of water column.

Electron Beam Coating System

The electron beam coating system, identified as Emission Unit #5, consists of a Faustel Offset Coater (Model No. 3110) and an ESI Electron Beam Cure unit (Model EZ 125/165/800), both of which are installed in-line with production Press M-3. The electron beam coating system applies a finish coating to an oriented polypropylene (OPP) film that is printed by the Production Press M-3. The electron beam coating system operates pursuant to Plan Approval #1-P-11-014, dated 10/21/11, and is subject to the BACT requirements of 310 CMR 7.02(8)(a)2.

Propane-Fired Emergency Engine/Generator (33 electrical kilowatts)

The emergency engine/generator is rated at 33 electrical kilowatts of output (approximately 0.5 MMBtu/hr heat input rate burning propane). The emergency engine/generator was installed before June 12, 2006 (installed in 2004) and prior to the facility establishing caps to formally limit HAP emissions to below major source thresholds. However, the facility's HAP emissions were limited to below major source thresholds prior to the date of the first substantive requirement in 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Therefore, the propane-fired emergency generator is an existing spark ignition engine (installed before June 12, 2006) located at an area source of HAP. It is subject to 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Miscellaneous Combustion Units Greater Than 3 MMBtu/hr

In addition to the propane-fired units used in the printing process, propane heaters are used for comfort heating in the production areas and offices. These two units are identified as the North End Propane-fired Air Rotation Unit and the South End Propane-fired Air Rotation Unit. Both of these units have a maximum heat input capacity of 3 MMBtu/hr.

Any fuel burning equipment ≥ 3 MMBtu/hr heat input will be subject to the requirements of 310 CMR 7.04(4)(a) Inspection, Maintenance and Testing.

Corona Treater

The Corona Surface Treatment Device (Corona Treater), identified as Emission Unit #8, is manufactured by Enercon Industries Corporation and is installed on Production Printing Press #3. Its purpose is to remove oils from a film substrate, increasing surface tension of the substrate and enhancing the adhesion of inks. The air flow through the corona treater will be vented to a catalytic ozone decomposer that will reduce an input ozone level of up to 150 ppm to less than 0.1 ppm. The Corona Treater is subject to the requirements of 310 CMR 7.03(21).

B. DESCRIPTION OF FACILITY AND OPERATIONS – (Exempt Activities)

Pursuant to 310 CMR 7.00 Appendix C(5)(h), the following activities are exempt from the

requirements of 310 CMR 7.00: Appendix C(5)(b). They have been included here for descriptive purposes. As specified in Table 2 herein, the facility is required to maintain an up-to-date copy of the list of exempt activities which shall be kept on-site at the facility and a copy shall be submitted to the MassDEP's Regional Office. Emissions from these activities will be reported on the annual emissions statement pursuant to 310 CMR 7.12.

Pigment Wastewater Treatment Process

The lab and production printing press equipment is cleaned with water at the end of each order. The resulting wash water and ink residual is pumped to overhead piping and gravity conveyed to the pigment wastewater treatment system. Collected wash water is treated approximately once per day in an open 1,200-gallon tank. The treatment process involves the addition of sulfuric acid, coagulant, and flocculent. The treated wash water then is filtered through a frame and plate filter. The filtrate is discharged to the local publicly owned treatment works (POTW), and the solids are temporarily stored in roll-off containers and disposed off site as a non-hazardous waste.

Because the VOCs contained in the wash water are water soluble compounds with very low vapor pressures (i.e., ranging from less than 0.01 to 0.4 millimeters of mercury), the potential VOC emissions resulting from this wastewater treatment process are approximately 0.7 tons per year. However, actual emissions from this process are accounted for in the calculation of emissions from the production and lab printing presses.

Zinc Electroplating Process

Zinc electroplating involves a 119 gallon zinc dissolving tank, a 845 gallon zinc electroplating tank, and a 16 gallon Carbolux tank. Each of these tanks is equipped with a cover that fully encloses the bath. Solution from the dissolving tank is fed automatically via plastic tubing to the electroplating tanks to maintain the zinc level at a concentration of 30 grams per liter. The composition of the two zinc tanks is the same with the exception of the concentration of zinc. The purpose of the Carbolux tank is to precipitate the excess sodium carbonate from the zinc plating solution. For the zinc electroplating process, sodium hydroxide emissions, in the form of condensable particulate matter, are estimated at less than 750 pounds per year.

Engraving Process

The laser engraving process involves the use of a laser to engrave rotogravure cylinders that have been plated with a layer of zinc. Particulate matter emissions generated by the laser engraver will be vented to a filter cartridge, carbon filter, and an aerosol filter. For the engraving process, particulate matter emissions are estimated at less than 850 pounds per year before control and less than 1 pound per year after control.

Miscellaneous Combustion Units Less Than 3 MMBtu/hr

The facility has various propane-fired heating and process units each with a maximum heat input capacity of less than 3 MMBtu/hour which are identified on the facility's exempt activity list.

2. EMISSION UNIT IDENTIFICATION

The following emission units (Table 1) are subject to and regulated by this Operating Permit:

Table 1a			
Emission Unit (EU#)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
EU #1	Rotogravure Production Press M-1 Kochsiek/502 and Eclipse, 40 RAH/ Propane-Fired Drying Oven	24,000 square meter/hour /3.17 MMBtu/hr	None
	Rotogravure Production Press M-2 Kochsiek/502D and KAG, LB-100N/ Propane-Fired Drying Oven	28,800 square meter/hour /3.17 MMBtu/hr	
	Rotogravure Production Press M-3 Kochsiek/502D and KAG, LB-100N/ Propane-Fired Drying Oven	28,800 square meter/hour /3.17 MMBtu/hr	
	Rotogravure Production Press M-4 Kochsiek/4153 and KWG, LB-300-N/ Propane-Fired Drying Oven	49,140 square meter/hour /5.89 MMBtu/hr	
	Rotogravure Production Press M-6 Kochsiek/4153 and Venti Oelde, VR40-900/ Propane-Fired Drying Oven	73,710 square meter/hour /12.7 MMBtu/hr	
EU #2	Rotogravure Lab Press L-1 Kochsiek/85 /Drying oven (heated by a GTS 1.5 MMBtu/hr propane-fired hot oil system)	3,600 square meter/hour	None
	Rotogravure Lab Press L-3 Giave/5E-700 / Propane-Fired Drying Oven	3,600 square meter/hour and 1.28 MMBtu/hr	
	Rotogravure Lab Press L-4 Kochsiek//212H / Propane-Fired Drying Oven	5,760 square meter/hour and 1.5 MMBtu/hr	
EU #3	Laminating Room containing: 6 Presses (4 of the 6 presses are heated by a GTS 1.5 MMBtu/hr propane-fired hot oil system), 3 Electric Drying Ovens and Resin Mixing	96 laminates/hour	None
EU #4	Hard Chromium Electroplating Process	Rectifier Capacity=13,000 ampere	Mist eliminator and multi-stage composite mesh pad with a final stage HEPA filter
EU #5	Electron Beam Coating System – Faustel 3110(Coater) ESI EZ 125/165/800 (Electron Beam Cure)	175 meters of printed OPP film/minute	None
EU #6	Propane-fired Emergency Stationary Reciprocating Internal Combustion Engine	33 kilowatts of output (0.5 MMBtu/hr of heat input)	None
EU #7	North End, Johnson AR-85-DE-10-MG-F1 Propane-fired Air Rotation Unit	3 MMBtu/hr	None
	South End, Johnson AR-85-DE-10-MG-F1 Propane-fired Air Rotation Unit	3 MMBtu/hr	
EU #8	Corona Surface Treatment Device	None	catalytic ozone decomposer

Table 1b			
Emission Unit (EU#)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
EU #9	Electron Beam Coating System (including cleanup operations) consisting of the following equipment: <ul style="list-style-type: none"> • Faustel MCL 3 Roll Offset Gravure Coater • ESI EZcure I Model 125/60/750 with a Selfshield Model SF 125/750 -Electron Beam Curing Unit 	<ul style="list-style-type: none"> • Maximum 200 meters of printed OPP film per minute • Maximum coating width of 0.6 meters 	None
EU #10	Corotec UNI-50 corona surface treatment device	None	Corotec Nozone System (catalytic ozone decomposer)

Table 1 Notes:

MMBtu/hr = million British thermal units per hour

OPP = oriented polypropylene

3. IDENTIFICATION OF EXEMPT ACTIVITIES

The following are considered exempt activities in accordance with the criteria contained in 310 CMR 7.00: Appendix C(5)(h):

Table 2	
Description of Current Exempt Activities	Reason
The list of current exempt activities is contained in the Operating Permit application and shall be updated by the Permittee to reflect changes at the facility over the Permit term. An up-to-date copy of exempt activities list shall be kept on-site at the facility and a copy shall be submitted to the MassDEP's Regional Office. Emissions from these activities shall be reported on the annual emissions statement pursuant to 310 CMR 7.12.	310 CMR 7.00:Appendix C(5)(h)

4. APPLICABLE REQUIREMENTS

A. OPERATIONAL AND/OR PRODUCTION EMISSION LIMITS AND RESTRICTIONS

The Permittee is subject to the limits/restrictions as contained in Table 3 below:

Table 3					
EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards²	Applicable Regulation and/or Approval No
EU #1	Coatings/inks, paper and film	VOC/ Total HAP Single HAP	1. Interprint shall use coatings with a VOC content no greater than specified in the coating list in Section 5. Special Terms and Conditions, Table 8.	≤49.0 tpy of VOCs in any 12 consecutive month period	PA #1-P-11-008
			2. If Interprint uses a new coating to replace an existing coating on the coating list in Section 5. Special Terms and conditions, Table 8, the new coating shall have a VOC content no greater than the coating it is replacing.	----- ≤24.5 tpy of total HAPs in any 12 consecutive month period -----	
	3. If Interprint develops a new type of coating that does not replace an existing coating, and that has a higher VOC content than its existing coatings on the coating list in Section 5. Special Terms and conditions, Table 8, it will evaluate this new coating (e.g., using its lab printing presses) to document that it has developed the coating with the lowest VOC content possible.	----- ≤9.8 tpy of any single HAP in any 12 consecutive month period			
	4. Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.		40 CFR 63.825(b)		
	Propane	Particulate matter	None	Each propane-fired drying oven shall not exceed 0.10 lb/MMBtu	Regulation 310 CMR 7.02(8)(h)
		smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)

Table 3a					
EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
EU #2	Coatings/inks, paper and film	VOC/HAP	<p>5. In the development of new designs, Interprint shall use coatings with a VOC content no greater than specified in the coating list in Section 5. Special Terms and Conditions, Table 8.</p> <p>6. In processing limited production orders Interprint shall use coatings with VOC contents no greater than the contents listed in Section 5. Special Terms and Conditions, Table 8.</p> <p>7. If Interprint uses a new coating to replace an existing coating, the new coating shall have a VOC content no greater than the coating it is replacing.</p> <p>8. If, for purposes of new product development, Interprint develops a new type of coating that does not replace an existing coating listed in Section 5. Special Terms and Conditions, Table 8, and that has a higher VOC content than any of its existing coatings listed in Section 5. Special Terms and Conditions, Table 8, Interprint shall evaluate such a coating on its lab printing presses and limit emissions from the lab printing presses to the following rates over an 8-hour averaging period.</p> <p>a. Lab Press L-1 shall be limited to 5.3 lb/hr b. Lab Press L-4 shall be limited to 5.3 lb/hr c. Lab Press L-3 shall be limited to 8.5 lb/hr</p>	See Section 5. Special Terms and Conditions, Table 8.	PA #1-P-11-008 and PA#1-P-11-013 (issued 10/26/11)
EU #3	Liquid resin, phenolic core paper and melamine overlay	VOC/HAP	9. No more than 202,176 laminates shall be produced (ranging from 12 x 12 inches to 20 x 20 inches) in any 12 consecutive month period	None	PA #1-P-11-008
EU #4	Chromic acid	Chromium	10. In accordance with 40 CFR 63.343(c)(1)(ii), the composite mesh-pad system shall be operated within ± 2 inches of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests	≤ 0.015 milligrams per dry standard cubic meter (6.6×10^{-6} gr/dscf)	40 CFR Part 63, Subpart N

Table 3b

EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
EU #4	Chromic acid	Chromium	11. In accordance with 40 CFR 63.343(c)(4)(ii), the fiber bed mist eliminator shall be operated within ±1 inches of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.		40 CFR Part 63, Subpart N
EU #5	Coatings/film	VOC	None	≤19,500 pounds/year in any 12 consecutive month period and ≤4,875 pounds/calendar month	PA #1-P-11-014
EU #6	Propane		See Section 5. Special Terms and Conditions, Table 8.		40 CFR Part 63, Subpart ZZZZ
		smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
EU #7	Propane	Particulate Matter	None	Each propane-fired unit shall not exceed 0.10 lb/MMBtu	Regulation 310 CMR 7.02(8)(h)
		smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
EU #8 EU #10	Coatings/film	Ozone	None	Reduce ozone emissions by 99.9% or to an emission limit of 0.1 ppm at the catalytic device outlet	Regulation 310 CMR 7.03(21)

Table 3c					
EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
EU #9	Coatings/film/cleanup solvents	VOC	See Section 5. Special Terms and Conditions, Table 8.	≤ 2.15 tons per calendar month and ≤ 8.57 tons in any 12 consecutive month period	PA #WE-14-002 (issued 6/6/14)
		Total HAP		≤137.0 pounds per calendar month and ≤ 548.0 pounds in any 12 consecutive month period	PA #WE-14-002 (issued 6/6/14)
Facility-wide		Greenhouse gas ¹	None	N/A	310 CMR 7.71 (state only)
		VOC	None	≤49.0 tpy in any 12 consecutive month period	PA #1-P-11-008 PA #1-P-11-014
		Total HAP	None	≤24.5 tpy in any 12 consecutive month period	PA #1-P-11-013 (issued 10/26/11)
		Single HAP	None	≤9.8 tpy in any 12 consecutive month period	

Table 3 Notes:

EU # = Emission Unit
 VOC = Volatile Organic Compounds
 HAP = Hazardous Air Pollutant
 lbs/hr = pounds per hour
 lb/MMBtu = pounds per million British thermal units of heat input
 gr/dscf = grains per dry standard cubic foot
 tpy = tons per year
 ppm = parts per million
 ≤ = less than or equal to
 % = percent

- (1) Greenhouse Gas means any chemical or physical substance that is emitted into the air and that the department may reasonably anticipate will cause or contribute to climate change including, but not limited to, CO₂, CH₄, N₂O, SF₆, hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs)
- (2) To calculate the amount of any consecutive 12 month period, take the current calendar month amount and add it to the previous 11 calendar months total amount

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to the monitoring/testing, record keeping, and reporting requirements as contained in Tables 4, 5, and 6 below and 310 CMR 7.00 Appendix C (9) and (10) and applicable requirements contained in Table 3:

Table 4a	
EU#	Monitoring And Testing Requirements
1	<p>1. In accordance with DEP Approval 1-P-11-008(9/29/11), Interprint shall monitor on a calendar month basis for EU #1:</p> <ul style="list-style-type: none"> a. The type of coatings used; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by EU #1 <p>2. In accordance with 40 CFR 63.825(b)(4), Interprint shall demonstrate compliance with the emission standard in condition #4, Table 3 herein, by demonstrating that the monthly average as-applied organic HAP content of all materials applied during the month is less than 0.04 kilograms HAP per kilograms of material applied as determined by Equation 6 contained in 40 CFR Part 63 Subpart KK.</p> <p>3. In accordance with 40 CFR 63.827(b)(2), Interprint shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material applied by following one of the procedures specified below:</p> <ul style="list-style-type: none"> a. The owner or operator may test the material in accordance with Method 311 of Appendix A of 40 CFR Part 63. The Method 311 determination may be performed by the owner or operator of the affected source, the supplier of the material, or an independent third party. The organic HAP content determined by Method 311 must be calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(i)(A) through (C) of this section. b. The owner or operator may determine the weight fraction volatile matter of the material in accordance with 40 CFR 63.827(c)(2) and use this value for the weight fraction organic HAP for all compliance purposes. c. The owner or operator may use formulation data to determine the weight fraction organic HAP of a material. Formulation data may be provided to the owner or operator on a CPDS by the supplier of the material or an independent third party. Formulation data may be used provided that the weight fraction organic HAP is calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(iii)(A) through (D) of this section. In the event of an inconsistency between the formulation data and the result of Method 311 of appendix A of this part, where the test result is higher, the Method 311 data will take precedence unless, after consultation, the owner or operator can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. <p>4. In accordance with 310 CMR 7.04(4)(a), inspect and maintain each unit with an individual heat input capacity of greater than or equal to 3 MMBtu/hr in accordance with the manufacturer's recommendations and tested for efficient operation once each calendar year.</p>

Table 4b	
EU#	Monitoring And Testing Requirements
2	<p>5. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013 (10/26/11), Interprint shall monitor on a calendar month basis for EU #2:</p> <ul style="list-style-type: none"> a. The type of coatings used in each machine; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by Lab Presses (L-1, L-3 and L-4 collectively)
3	<p>6. In accordance with DEP Approval 1-P-11-008(9/29/11), Interprint shall monitor on a daily basis the number of laminates produced from the Laminating Room.</p>
4	<p>7. In accordance with 40 CFR 63.342(g) Interprint shall comply with the following operation and maintenance practices for the composite mesh pad system with a final stage HEPA filter.</p> <ul style="list-style-type: none"> a. Once per quarter, visually inspect device to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device. b. Once per quarter, visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist. c. Once per quarter, visually inspect ductwork from tank to the control device to ensure there are no leaks. d. Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations. <p>8. In accordance with 40 CFR 63.342(g) Interprint shall comply with the following operation and maintenance practices for the mist eliminator.</p> <ul style="list-style-type: none"> a. Once per quarter, visually inspect fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices. b. Once per quarter, visually inspect ductwork from tank or tanks to the control device to ensure there are no leaks. c. Perform washdown of fiber elements in accordance with manufacturers recommendations <p>9. In accordance with 40 CFR 63.343(c)(1)(ii), Interprint shall monitor the pressure drop across the composite mesh-pad system once each day that the affected source is operating.</p> <p>10. In accordance with 40 CFR 63.343(c)(1)(iii), Interprint may repeat the performance test and establish as a new site-specific operating parameter the pressure drop across the composite mesh-pad system according to the requirements in 40 CFR 63.343(c)(1)(i) or (ii). To establish a new site-specific operating parameter for pressure drop, Interprint shall satisfy the following requirements.</p> <ul style="list-style-type: none"> a. Determine the outlet chromium concentration using the test methods and procedures in 40 CFR 63.344(c); b. Establish the site-specific operating parameter value using the procedures 40 CFR 63.344(d)(5); c. Satisfy the recordkeeping requirements in 40 CFR 63.346(b)(6) through(8); and d. Satisfy the reporting requirements in 40 CFR 63.347(d) and (f).

Table 4c	
EU#	Monitoring And Testing Requirements
4	<p>11. In accordance with 40 CFR 63.343(c)(4)(ii), Interprint shall monitor the pressure drops across the fiber-bed mist eliminator once each day that the affected source is operating.</p> <p>12. In accordance with 40 CFR 63.344, Interprint shall comply with the applicable performance test requirements and test methods contained in this section.</p>
5	<p>13. In accordance with DEP Approval 1-P-11-014(10/21/11), Interprint shall monitor on a calendar month basis for EU #5:</p> <ul style="list-style-type: none"> a. The type of coatings used; b. Pounds of each coating applied; c. The VOC content of the coatings used; and d. The pounds of VOC emitted by EU #5
6	<p>14. In accordance with 40 CFR 63.6625(e), and effective 10/19/2013, Interprint must operate and maintain EU #6 and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.</p> <p>15. In accordance with 40 CFR 63.6625(f), and effective 10/19/2013, EU #6 shall be equipped with a non-resettable hour meter.</p> <p>16. In accordance with 40 CFR 63.6625(h), and effective 10/19/2013, Interprint shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.</p> <p>17. In accordance with 40 CFR 63.6625(j), and effective 10/19/2013, Interprint has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to 40 CFR Part 63 Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.</p>
7	<p>18. In accordance with 310 CMR 7.04(4)(a), inspect and maintain each unit with an individual heat input capacity of greater than or equal to 3 MMBtu/hr in accordance with the manufacturer's recommendations and tested for efficient operation once each calendar year.</p>
Facility-wide	<p>19. In accordance with DEP Approval 1-P-11-008(9/29/11), DEP Approval 1-P-11-013 (10/26/11) and DEP Approval 1-P-11-014 (10/21/11), Interprint shall monitor on a calendar month basis, the total pounds of VOC and HAP emitted from the entire facility.</p>

Table 4d	
EU#	Monitoring And Testing Requirements
Facility-wide	<p>20. In accordance with 310 CMR 7.13 Stack Testing, conduct stack testing, upon written request of the MassDEP, for any air contaminant for which the MassDEP has determined testing is necessary, to ascertain compliance with the MassDEP's regulations or design approval provisos. All such testing shall be conducted in accordance with 310 CMR 7.13 (1) and (2), and in accordance with the applicable procedures specified in 40 CFR 60 Appendix A or other method if approved by the MassDEP and EPA.</p> <p>In accordance with 310 CMR 7.00 Appendix C(9)(b), any compliance determination with the allowable smoke/opacity emission limit shall be in accordance with EPA Method 9, as specified in 40 CFR 60, Appendix A or shall be made using a continuous opacity monitor installed and operated in accordance with 40 CFR Appendix B.</p> <p>21. In accordance with 310 CMR 7.71(1) and Appendix C(9) establish and maintain data systems or record keeping practices (e.g. fuel use records, SF6 usage documentation, Continuous Emissions Monitoring System) for greenhouse gas emissions to ensure compliance with the reporting provisions of M.G.L. c. 21N, the Climate Protection and Green Economy Act, St. 2008, c. 298, § 6. (State only requirement)</p>

Table 4 Notes:

- EU # = Emission Unit
- VOC = Volatile Organic Compound
- HAP = Hazardous Air Pollutant
- CPDS = Certified Product Data Sheet
- MMBtu/hr = million British thermal unit per hour
- CFR = Code of Federal Regulations

Table 5a	
EU#	Record Keeping Requirements
1	<p>1. In accordance with DEP Approval 1-P-11-008(9/29/11), Interprint shall document the coating development process as specified in Table 3, condition #3 herein through trial reports and other relevant records, and keep such records on-site and available for inspection.</p> <p>2. In accordance with DEP Approval 1-P-11-008(9/29/11), Interprint shall maintain comprehensive and accurate records on a calendar month basis for EU #1:</p> <ul style="list-style-type: none"> a. The type of coatings used; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by EU #1 <p>3. In accordance with 40 CFR 63.829(b), Interprint shall maintain the following records on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) :</p> <ul style="list-style-type: none"> a. Records specified in 40 CFR 63.10(b)(2), of all measurements needed to demonstrate compliance with this standard, such as, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report. <p>4. In accordance with 40 CFR 63.829(c) Interprint shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.825. The records shall be maintained in accordance with the requirements of 40 CFR 63.10(b).</p> <p>5. In accordance with 310 CMR 7.04(4)(a), maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These said records shall be posted conspicuously on or near each unit.</p>
2	<p>6. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013 (10/26/11), after conducting such a coating development process but before commencing production using a new coating, Interprint shall document that it has developed a coating with the lowest VOC content possible. Interprint shall document this process through its trial reports and other relevant records, and keep these records on-site and available for review.</p> <p>7. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013 (10/26/11), Interprint shall maintain comprehensive and accurate records on a calendar month basis for EU #2:</p> <ul style="list-style-type: none"> a. The type of coatings used in each machine; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by Lab Presses (L-1, L-3, and L-4 collectively). <p>8. Interprint shall maintain comprehensive and accurate records of the pounds of VOC per hour, based on an 8-hour averaging period, emitted from each of the lab printing presses when Interprint is using a new type of coating that does not replace an existing coating listed in Section 5. Special Terms and Conditions, Table 8, and that has a higher VOC content than any of its existing coatings listed in Section 5. Special Terms and Conditions, Table 8.</p> <p>9. Interprint shall maintain comprehensive and accurate records of the annual VOC emissions from any new product development.</p>
3	<p>10. In accordance with DEP Approval 1-P-11-008(9/29/11), Interprint shall record on a daily basis the number of laminates produced from the Laminating Room. The total number of laminates produced each month shall be summed from the daily records, and recorded to track the 12-month rolling total of laminates produced.</p>

Table 5b	
EU#	Record Keeping Requirements
4	<p>11. In accordance with 40 CFR 63.343(c)(1)(ii), Interprint shall record the pressure drop across the composite mesh-pad system once each day that the affected source is operating.</p> <p>12. In accordance with 40 CFR 63.343(c)(4)(ii), Interprint shall record the pressure drop across the fiber-bed mist eliminator once each day that the affected source is operating.</p> <p>13. In accordance with 40 CFR 63.346(b)(1) through (12), (16) and 63.346 (c), Interprint shall maintain the following records:</p> <ul style="list-style-type: none"> a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR 63.342(f) and Table 1 of 40 CFR 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. b. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3); f. Test reports documenting results of all performance tests; g. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of 40 CFR 63.344(e); h. Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; k. The total process operating time of the affected source during the reporting period; l. Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period, if the owner or operator is using the actual cumulative rectifier capacity to determine facility size in accordance with 40 CFR 63.342(c)(2); m. All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10, and 63.347. n. All records shall be maintained for a period of 5 years in accordance with 40 CFR 63.10(b)(1).

Table 5c	
EU#	Record Keeping Requirements
5	<p>14. In accordance with DEP Approval 1-P-11-014(10/21/11), Interprint shall record on a calendar month basis for EU #5:</p> <ul style="list-style-type: none"> a. The type of coatings used; b. Pounds of each coating applied; c. The VOC content of the coatings used; and d. The pounds of VOC emitted by EU #5 <p>All emissions from Press M-3 (EU #1), even while operating in conjunction with the Electron Beam Coating System, will be tracked in accordance with the provisions of MassDEP Final Approval #1-P-11-008 issued September 29, 2011.</p>
6	<p>15. In accordance with 40 CFR 63.6655(a),(d), (e) and (f) and effective 10/19/2013, Interprint shall maintain comprehensive and accurate records of:</p> <ul style="list-style-type: none"> a. a copy of each notification and report that you submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). b. the occurrence and duration of each malfunction of operation (i.e process equipment) or the air pollution control and monitoring equipment. c. performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(vii). d. all required maintenance performed on the air pollution control and monitoring equipment. e. actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b) including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. f. the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you. g. the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. h. the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.
7	<p>16. In accordance with 310 CMR 7.04(4)(a), maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These said records shall be posted conspicuously on or near each unit.</p>
8 10	<p>17. In accordance with 310 CMR 7.03(6), a recordkeeping system shall be established and continued in sufficient detail to document the date of construction, substantial reconstruction or alteration and that the respective emission rates, operational limitations, equipment specifications and other requirements pursuant to 310 CM R 7.03 are met. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination.</p>

Table 5d	
EU#	Record Keeping Requirements
9	<p>18. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain comprehensive and accurate records for EU #9 which shall include:</p> <ul style="list-style-type: none"> a. The identity of each coating and cleanup solvent used in EU #9; b. The VOC and HAP content of each coating as-applied, used in EU #9; c. The VOC and HAP content of each cleanup solvent, used in EU #9; d. The amount (pounds) of each coating used in EU #9 during each month and in each 12 consecutive month period; e. The amount (gallons) of each cleanup solvent used in EU #9 during each month and in each 12 consecutive month period; f. The total pounds of VOCs emitted from EU #9; and g. The total pounds of HAPs emitted from EU #9. <p>All emissions from Lab Press L- 3 (EU #2), even while operating in conjunction with the Electron Beam Coating System (EU #9), shall be tracked in accordance with the provisions of MassDEP Final Approval #1-P-11-008 issued September 29, 2011.</p>
	<p>19. In accordance with MassDEP Approval WE-14-002 (6/6/14), when using coatings which contain a VOC content greater than 3.07% by weight, the Permittee shall maintain comprehensive and accurate records of:</p> <ul style="list-style-type: none"> a. the pounds of VOC per hour emitted from EU #9; and b. the total VOC emissions from the use of coatings containing a VOC content greater than 3.07% by weight during each month and in each 12 consecutive month period.
	<p>20. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 3c , Table 8d and Table 8e herein. 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 15th 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/dep/air/approvals/aqforms.htm#report .</p>
	<p>21. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain a copy of Plan Approval WE-14-002, underlying Application and the most up-to-date SOMP for EU #9 on-site.</p>
	<p>22. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain a record of routine maintenance activities, affecting air contaminant emission rates, performed on EU #9. 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.</p>
	<p>23. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on EU #9. 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.</p>

Table 5e	
EU#	Record Keeping Requirements
Facility -wide	24. In accordance with DEP Approval 1-P-11-008(9/29/11), DEP Approval 1-P-11-013 (10/26/11), and DEP Approval 1-P-11-014 (10/21/11), Interprint shall maintain comprehensive and accurate records on a calendar month basis of the total pounds of VOC and HAP emitted from the entire facility.
	25. In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain records of all monitoring data and supporting information, including all stack test results and all ambient air quality modeling results, on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application
	26. In accordance with 310 CMR 7.12(3)(b), maintain copies of Source Registration and other information supplied to the Department to comply with 310 CMR 7.12, which shall be retained by the facility owner or operator for five years from the date of submittal.
	27. In accordance with 310 CMR 7.71 (6) b. and c. retain at the facility for five years and make available to the Department upon request copies of the documentation of the methodology and data used to quantify emissions. (State only requirement)

Table 5 Notes:

EU # = Emission Unit

VOC = Volatile Organic Compound

HAP = Hazardous Air Pollutant

RICE= Reciprocating Internal Combustion Engine

CFR = Code of Federal Regulations

SOMP = Standard Operating and Maintenance Procedure

Table 6a	
EU#	Reporting Requirements
1	<p>1. In accordance with 40 CFR 63.830(b)(6), Interprint shall submit a summary report specified in 40 CFR 63.10(e)(3) of this part on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 63.825. The summary report shall include, as applicable:</p> <ul style="list-style-type: none"> a. Exceedances of the standards in 40 CFR 63.824–63.825. b. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.823(b), including actions taken to correct a malfunction. <p>All summary reports shall be delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>2. In accordance with 40 CFR 63.830(c)(2), all reports required by this subpart not subject to the requirements in paragraph (c)(1) of this section must be sent to MassDEP and the USEPA at the appropriate address listed in 40 CFR 63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The USEPA and MassDEP retain the right to require submittal of reports subject to paragraph (c)(1) of this section in paper format.</p>
1 2 3	<p>3. In accordance with DEP Approval 1-P-11-008(9/29/11), DEP Approval 1-P-11-013 (10/26/11), and DEP Approval 1-P-11-014 (10/21/11), Interprint shall generate monthly reports in-house, by the 15th day of the following month, that document compliance with the rolling 12-month total emission limits for EU 1,2,3 and facility-wide as well as the associated production limits for EU 1, 2 and 3 specified in Table 3 herein.</p>
4	<p>4. In accordance with 40 CFR 63.347(d), Interprint shall notify the USEPA and MassDEP of the intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin.</p> <p>5. In accordance with 40 CFR 63.347(f), reports of performance test results shall be submitted to the MassDEP no later than 90 days following the completion of the performance test.</p> <p>6. In accordance with 40 CFR 63.347(g)(1), Interprint shall submit a summary report semiannually to the USEPA and MassDEP to document the ongoing compliance status of the source except when:</p> <ul style="list-style-type: none"> a. The USEPA or MassDEP determines on a case-by-case that more frequent reporting is necessary to accurately assess the compliance status of the source; or b. The monitoring data collected by the owner or operator of the affected source in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once Interprint reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

Table 6b	
EU#	Reporting Requirements
4	<p>7. In accordance with 40 CFR 63.347(g)(3), the summary report shall contain the following information:</p> <ul style="list-style-type: none"> a. The company name and address; b. An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c); c. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by 40 CFR 63.347(e);. d. The beginning and ending dates of the reporting period; e. A description of the type of process performed in the affected source; f. The total operating time of the affected source during the reporting period; g. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes; h. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan for the source; i. If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed; j. A description of any changes in monitoring, processes, or controls since the last reporting period; k. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and l. The date of the report.
6	<p>8. In accordance with 40 CFR 63.6603 and 63.6640, Footnote 2 of Table 2d, and effective 10/19/2013, if an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice as soon as practicable and the Federal, State or local law under which the risk was deemed unacceptable.</p> <p>9. In accordance with 40 CFR 63.6640(e) and effective 10/19/2013, Interprint shall report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you.</p>

Table 6c	
EU#	Reporting Requirements
9	10. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall notify MassDEP, in writing, the date on which EU #9 commences operation at the facility. This notice shall be provided to MassDEP within (5) days of commencing operation
	11. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall submit to MassDEP all information required by Plan Approval WE-14-002 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).
	12. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall provide a copy to MassDEP of any record required to be maintained by Plan Approval WE-14-002 within 30-days from MassDEP's request.
	13. In accordance with MassDEP Approval WE-14-002 (6/6/14), 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 4d herein.
	14. In accordance with MassDEP Approval WE-14-002 (6/6/14), 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 4d herein.
Facility-wide	15. The permittee shall submit a Source Registration/Emission Statement Form to MassDEP on an annual basis as required by 310 CMR 7.12.
	16. In accordance with 310 CMR 7.13(1) and 7.13(2), if determined by MassDEP that stack testing is necessary to ascertain compliance with the Department's regulations or design approval provisos shall cause such stack testing to be summarized and submitted to the MassDEP as prescribed in the agreed to pretest protocol.
	17. In accordance with 310 CMR 7.00: Appendix C(10)(c). the permittee shall report a summary of all monitoring data and related supporting information to MassDEP at least every six months (January 30 and July 30 of each calendar year).
	18. Submit Annual Compliance report to MassDEP and USEPA by January 30 of each year and as required by General Condition 10 of this Permit.
	19. In accordance with 310 CMR 7.71(5), by April 15 th , 2010 and April 15 th of each year thereafter report emissions of greenhouse gases from stationary emissions sources including, but not limited to, emissions from factory stacks, manufacturing processes and vents, fugitive emissions, and other process emissions; and owned or leased motor vehicles when stationary source greenhouse gas emissions are greater than 5,000 short tons CO ₂ e. Report greenhouse gas emissions electronically in a format that can be accommodated by the registry. (State only requirement)
	20. In accordance with 310 CMR 7.71(6), certify greenhouse gas emissions reports using a form provided by MassDEP or the registry. (State only requirement)
	21. In accordance with 310 CMR 7.71(7), by December 31 st of the applicable year submit to MassDEP documentation of triennial verification of the greenhouse gas emissions report. (State only requirement)

Table 6 Notes:

EU # = Emission Unit
 USEPA = The United States Environmental Protection Agency
 MassDEP = Massachusetts Department of Environmental Protection
 CFR = Code of Federal Regulations

C. GENERAL APPLICABLE REQUIREMENTS

The Permittee shall comply with all generally applicable requirements contained in 310 CMR 7.00 et seq. and 310 CMR 8.00 et. seq., when subject.

D. REQUIREMENTS NOT CURRENTLY APPLICABLE

The Permittee is currently not subject to the following requirements:

Table 7	
Regulation	Reason
310 CMR 7.16: Reduction of Single Occupant Commuter Vehicle Use	Facility employs fewer than 250 people.
40 CFR Part 64 -Compliance Assurance Monitoring	Facility is exempt since it does not meet the applicability criteria specified in 40 CFR 64.10(a)(1) through (3).

5. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to and shall comply with the following special terms and conditions that are not contained in Table 3, 4, 5, and 6:

Table 8a																																																			
EU#	Special Terms And Conditions																																																		
1	1. EU #1 is subject to the National Emission Standards for the Printing and Publishing Industry, 40 CFR Part 63.820 through 63.831 and shall comply with all applicable standards.																																																		
1 2	2. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013(10/26/11), Interprint shall use inks with a VOC content no greater than specified in the following coating list. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Coating Identification</th> <th style="text-align: center;">Coating Percent VOC</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">Ex -1</td><td style="text-align: center;">0.91%</td></tr> <tr><td style="text-align: center;">Ex-2</td><td style="text-align: center;">0.18%</td></tr> <tr><td style="text-align: center;">Ex-3</td><td style="text-align: center;">0.18%</td></tr> <tr><td style="text-align: center;">Ex-4</td><td style="text-align: center;">1.56%</td></tr> <tr><td style="text-align: center;">YI-1</td><td style="text-align: center;">0.79%</td></tr> <tr><td style="text-align: center;">On -2</td><td style="text-align: center;">0.95%</td></tr> <tr><td style="text-align: center;">Re -1</td><td style="text-align: center;">0.67%</td></tr> <tr><td style="text-align: center;">Re-2</td><td style="text-align: center;">0.98%</td></tr> <tr><td style="text-align: center;">Be -1</td><td style="text-align: center;">1.16%</td></tr> <tr><td style="text-align: center;">BI-1</td><td style="text-align: center;">4.90%</td></tr> <tr><td style="text-align: center;">BI-2</td><td style="text-align: center;">1.30%</td></tr> <tr><td style="text-align: center;">BI-3</td><td style="text-align: center;">1.30%</td></tr> <tr><td style="text-align: center;">BI-4</td><td style="text-align: center;">1.30%</td></tr> <tr><td style="text-align: center;">Wt-1</td><td style="text-align: center;">1.80%</td></tr> <tr><td style="text-align: center;">Wt-2</td><td style="text-align: center;">0.30%</td></tr> <tr><td style="text-align: center;">Wt-3</td><td style="text-align: center;">0.47%</td></tr> <tr><td style="text-align: center;">Wt-4</td><td style="text-align: center;">0.53%</td></tr> <tr><td style="text-align: center;">YI-2</td><td style="text-align: center;">0.53%</td></tr> <tr><td style="text-align: center;">Re-3</td><td style="text-align: center;">1.50%</td></tr> <tr><td style="text-align: center;">Ex-5</td><td style="text-align: center;">1.81%</td></tr> <tr><td style="text-align: center;">Ex-6</td><td style="text-align: center;">3.48%</td></tr> <tr><td style="text-align: center;">Pe -1</td><td style="text-align: center;">1.80%</td></tr> <tr><td style="text-align: center;">Pe-2</td><td style="text-align: center;">1.00%</td></tr> <tr><td style="text-align: center;">Pe- 3</td><td style="text-align: center;">1.00%</td></tr> </tbody> </table>	Coating Identification	Coating Percent VOC	Ex -1	0.91%	Ex-2	0.18%	Ex-3	0.18%	Ex-4	1.56%	YI-1	0.79%	On -2	0.95%	Re -1	0.67%	Re-2	0.98%	Be -1	1.16%	BI-1	4.90%	BI-2	1.30%	BI-3	1.30%	BI-4	1.30%	Wt-1	1.80%	Wt-2	0.30%	Wt-3	0.47%	Wt-4	0.53%	YI-2	0.53%	Re-3	1.50%	Ex-5	1.81%	Ex-6	3.48%	Pe -1	1.80%	Pe-2	1.00%	Pe- 3	1.00%
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Table 8b.

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EU#	Special Terms And Conditions																																						
1 2	<table border="1"> <thead> <tr> <th>Coating Identification</th> <th>Coating Percent VOC</th> </tr> </thead> <tbody> <tr><td>Pe-4</td><td>1.80%</td></tr> <tr><td>Pe-5</td><td>1.70%</td></tr> <tr><td>Pe-6</td><td>2.10%</td></tr> <tr><td>Pe-7</td><td>1.80%</td></tr> <tr><td>Pr -1</td><td>0.10%</td></tr> <tr><td>Pr- 2</td><td>0.10%</td></tr> <tr><td>Sb-1</td><td>43.80%</td></tr> <tr><td>Cl-1</td><td>50.00%</td></tr> <tr><td>Df-1</td><td>0.00%</td></tr> <tr><td>Gw-1</td><td>0.00%</td></tr> <tr><td>PI-1</td><td>1.80%</td></tr> <tr><td>PI-5</td><td>0.06%</td></tr> <tr><td>PI-2</td><td>0.60%</td></tr> <tr><td>PI-6</td><td>1.00%</td></tr> <tr><td>PI- 3</td><td>1.40%</td></tr> <tr><td>PI-7</td><td>0.06%</td></tr> <tr><td>PI-4</td><td>3.50%</td></tr> <tr><td>PI- 8</td><td>0.04%</td></tr> </tbody> </table>	Coating Identification	Coating Percent VOC	Pe-4	1.80%	Pe-5	1.70%	Pe-6	2.10%	Pe-7	1.80%	Pr -1	0.10%	Pr- 2	0.10%	Sb-1	43.80%	Cl-1	50.00%	Df-1	0.00%	Gw-1	0.00%	PI-1	1.80%	PI-5	0.06%	PI-2	0.60%	PI-6	1.00%	PI- 3	1.40%	PI-7	0.06%	PI-4	3.50%	PI- 8	0.04%
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PI- 8	0.04%																																						
2	3. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013(10/26/11), in the event that Interprint's actual annual emissions for any new product development will exceed one ton of VOCs per year, Interprint shall submit a permit application to MassDEP in accordance with 310 CMR 7.02.																																						
4	<p>4. EU #4 is subject to the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR Part 63.340 through 63.348 and shall comply with all applicable requirements.</p> <p>5. In accordance with 40 CFR 63.342(f)(1)(i) through (iii),</p> <p>a. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices.</p> <p>b. Malfunctions shall be corrected as soon as practicable after their occurrence.</p> <p>c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.</p> <p>6. In accordance with 40 CFR 63.342(f)(3)(i), Interprint shall prepare, implement and maintain an up to date Operation and Maintenance Plan. The plan shall include the elements specified in 40 CFR 63.342(f)(3)(i)(A) through (E).</p> <p>7. In accordance with 40 CFR 63.343(c)(1)(iv), the requirement to operate a composite mesh-pad system within the range of pressure drop values established under 40 CFR 63.343(c)(1)(i) through (iii) does not apply during automatic washdown cycles of the composite mesh-pad system.</p>																																						

Table 8c.	
EU#	Special Terms And Conditions
6	<p>8. In accordance with 40 CFR 63.6595(a)(1), Interprint shall comply with the applicable requirements of 40 CFR Subpart ZZZZ by no later than October 19, 2013.</p> <p>9. In accordance with 40 CFR 63.6603, Table 2d, and effective 10/19/2013, Interprint shall:</p> <ul style="list-style-type: none"> a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary <p>Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement in Table 2d of 40 CFR Part 63 Subpart ZZZZ.</p> <p>10. In accordance with 40 CFR 63.6605(a) and (b), and effective 10/19/2013,</p> <ul style="list-style-type: none"> a. Interprint shall be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times. b. At all times Interprint must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. <p>11. In accordance with 40 CFR 63.6640(a), Table 6, and effective 10/19/2013, Interprint shall continuously comply with the work or management practices as required by the following :</p> <ul style="list-style-type: none"> a. Operate and maintain EU#6 according to the manufacturer's emission-related operation and maintenance instructions; or b. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Table 8d.

EU#	Special Terms And Conditions
6	<p>12. In accordance with 40 CFR 63.6640(f)(1)(i) through (iii), and effective 10/19/2013, operate the engine according to the conditions described in 40 CFR 63.6640(f)(1)(i) through (iii). If you do not operate the engine according to the requirements in 40 CFR 63.6640(f)(1)(i) through (iii), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.</p> <p>a. There is no time limit on the use of emergency stationary RICE in emergency situations.</p> <p>b. You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.</p> <p>c. You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by 40 CFR 63.6640 (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.</p>
1 4 6	<p>13. Emission unit #1 is subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table "1" to Subpart KK of 40 CFR 63]. Emission unit #4 is subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table "1" to Subpart N of 40 CFR 63]. Emission unit #6 is subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table "8" to Subpart ZZZZ of 40 CFR 63]. Compliance with all applicable provisions therein is required.</p>
9	<p>14. In accordance with DEP Approval WE-14-002 (6/6/14), EU #9 shall consist of the equipment specified in Table 1b herein</p> <p>15. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings used by EU #9 shall not exceed a VOC content of 3.07% by weight as-applied, except as allowed in accordance with Table 8d and 8e, condition #16 and #17 herein.</p> <p>16. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, VOC emissions shall not exceed 15 .6 pounds per hour when applying a coating which has a VOC content greater than 3.07% by weight as-applied.</p>

Table 8e.	
EU#	Special Terms And Conditions
9	<p>17. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the combined VOC emissions from the use of coatings containing a VOC content greater than 3.07% by weight as-applied shall be less than 1 ton in any 12 consecutive month period.</p>
	<p>18. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the cleanup solvents used by EU #9 shall not exceed a VOC content of 2.2% by weight and contain no HAPs.</p>
	<p>19. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 330 gallons of cleanup solvents shall be used in any 12 consecutive month period.</p>
	<p>20. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings used by EU #9 shall not exceed a HAP content of 0.0986% by weight as-applied.</p>
	<p>21. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 556,190 pounds of coating shall be used on EU #9 in any 12 consecutive month period.</p>
	<p>22. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices:</p> <ul style="list-style-type: none"> a. Store all VOC and/or HAP-containing coatings, process-related waste materials and VOC and/or HAP-containing materials in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials; d. convey VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: <ul style="list-style-type: none"> i. equipment cleaning is performed without atomizing the cleanup solvent; and, ii. all spent solvent is captured in closed containers; and f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.

Table 8f.	
EU#	Special Terms And Conditions
Facility -wide	23. The Permittee is subject to, and has stated in their Operating Permit application, TR#W204293, that the Permittee is in compliance with the requirements of 40 CFR 82: Protection of Stratospheric Ozone. These requirements are applicable to this facility and the United States Environmental Protection Agency enforces these requirements.

6. ALTERNATIVE OPERATING SCENARIOS

The Permittee did not request alternative operating scenarios in its Operating Permit application.

7. EMISSIONS TRADING

A. INTRA-FACILITY EMISSION TRADING

The Permittee did not request intra-facility emissions trading in its Operating Permit application.

B. INTER-FACILITY EMISSION TRADING

The Permittee did not request inter-facility emissions trading in its Operating Permit application.

8. COMPLIANCE SCHEDULE

The Permittee has indicated that the facility is in compliance and shall remain in compliance with the applicable requirements contained in Sections 4 and 5.

In addition, the Permittee shall comply with any applicable requirements that become effective during the Permit term.

GENERAL CONDITIONS FOR OPERATING PERMIT

9. FEES

The Permittee has paid the permit application processing fee and shall pay the annual compliance fee in accordance with the fee schedule pursuant to 310 CMR 4.00.

10. COMPLIANCE CERTIFICATION

All documents submitted to the MassDEP shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in compliance with 310 CMR 7.01(2) and contain the following language:

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment."

The "Operating Permit Reporting Kit" contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring Summary Report and Certification. The "Operating Permit Reporting Kit" is available to the Permittee via the MassDEP's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

A. Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this Operating Permit. The report shall be postmarked or delivered by January 30 to the MassDEP and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- 3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
- 4) any additional information required by the MassDEP to determine the compliance status of the source.

B. Semi-Annual Monitoring Summary Report and Certification

The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this Permit. The report shall be postmarked or delivered by January 30 and July 30 to the MassDEP. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status during the reporting period;
- 3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;
- 4) whether there were any deviations during the reporting period;
- 5) if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
- 6) whether deviations in the reporting period were previously reported;
- 7) if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
- 8) if the deviations in the reporting period have returned to compliance and date of such return to compliance; and
- 9) any additional information required by the MassDEP to determine the compliance status of the source.

11. NONCOMPLIANCE

Any noncompliance with a permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for Permit termination or revocation, or for denial of an Operating Permit renewal application by the MassDEP and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

12. PERMIT SHIELD

- A. This facility has a permit shield provided that it operates in compliance with the terms and conditions of this Permit. Compliance with the terms and conditions of this Permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7, for the emission units as described in the Permittee's application and as identified in this Permit.

Where there is a conflict between the terms and conditions of this Permit and any earlier approval

or Permit, the terms and conditions of this Permit control.

- B. The MassDEP has determined that the Permittee is not currently subject to the requirements listed in Section 4, Table 7.
- C. Nothing in this Permit shall alter or affect the following:
- 1) the liability of the source for any violation of applicable requirements prior to or at the time of Permit issuance.
 - 2) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
 - 3) the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Act.

13. ENFORCEMENT

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22, 7.70 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A

All other terms and conditions contained in this Permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the MassDEP, EPA and citizens as defined under the Act.

A Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

14. PERMIT TERM

This Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date 5 years after issuance of this Permit.

Permit expiration terminates the Permittee's right to operate the facility's emission units, control equipment or associated equipment covered by this Permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

15. PERMIT RENEWAL

Upon the MassDEP's receipt of a complete and timely application for renewal, this facility may continue to operate subject to final action by the MassDEP on the renewal application.

In the event the MassDEP has not taken final action on the Operating Permit renewal application prior to this Permit's expiration date, this Permit shall remain in effect until the MassDEP takes final action on the renewal application, provided that a timely and complete renewal application has been submitted in

accordance with 310 CMR 7.00: Appendix C(13).

16. REOPENING FOR CAUSE

This Permit may be modified, revoked, reopened, and reissued, or terminated for cause by the MassDEP and/or EPA. The responsible official of the facility may request that the MassDEP terminate the facility's Operating Permit for cause. The MassDEP will reopen and amend this Permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C(14).

The filing of a request by the Permittee for an Operating Permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any Operating Permit condition.

17. DUTY TO PROVIDE INFORMATION

Upon the MassDEP's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the MassDEP copies of records that the Permittee is required to retain by this Permit.

18. DUTY TO SUPPLEMENT

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a complete renewal application was submitted but prior to release of a draft permit.

The Permittee shall promptly, on discovery, report to the MassDEP a material error or omission in any records, reports, plans, or other documents previously provided to the MassDEP.

19. TRANSFER OF OWNERSHIP OR OPERATION

This Permit is not transferable by the Permittee unless done in accordance with 310 CMR 7.00: Appendix C(8)(a). A change in ownership or operation control is considered an administrative permit amendment if no other change in the Permit is necessary and provided that a written agreement containing a specific date for transfer of Permit responsibility, coverage and liability between current and new Permittee, has been submitted to the MassDEP.

20. PROPERTY RIGHTS

This Permit does not convey any property rights of any sort, or any exclusive privilege.

21. INSPECTION AND ENTRY

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the MassDEP, and EPA to perform the following:

- A. enter upon the Permittee's premises where an operating permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
- B. have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- C. inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- D. Sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the Operating Permit or applicable requirements as per 310 CMR 7.00 Appendix C(3)(g)(12).

22. PERMIT AVAILABILITY

The Permittee shall have available at the facility, at all times, a copy of the materials listed under 310 CMR 7.00: Appendix C(10)(e) and shall provide a copy of the Operating Permit, including any amendments or attachments thereto, upon request by the MassDEP or EPA.

23. SEVERABILITY CLAUSE

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

24. EMERGENCY CONDITIONS

The Permittee shall be shielded from enforcement action brought for noncompliance with technology based¹ emission limitations specified in this Permit as a result of an emergency². In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

¹ Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

² An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

- A. an emergency occurred and that the Permittee can identify the cause(s) of the emergency;
- B. the permitted facility was at the time being properly operated;
- C. during the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and
- D. the Permittee submitted notice of the emergency to the MassDEP within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response, immediate notification to the appropriate parties should be made as required by law.

25. PERMIT DEVIATION

Deviations are instances where any permit condition is violated and not reported as an emergency pursuant to section 24 of this Permit. Reporting a permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements listed in Table 6. of this Operating Permit shall supersede the following deviation reporting requirements, if applicable.

The Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention the following deviations from permit requirements, by telephone, fax or electronic mail (e-mail) , within three (3) days of discovery of such deviation:

- A. Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
- B. Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the Permit or approval as surrogate for an emission limit.
- C. Exceedances of Permit operational limitations directly correlated to excess emissions.
- D. Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- E. Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the MassDEP Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available to the Permittee via the MassDEP's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

This report shall include the deviation, including those attributable to upset conditions as defined in the

Permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone, fax or electronic mail (e-mail) within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The Permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the Permit and in compliance with all applicable requirements provided the Permittee gives the EPA and the MassDEP written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(h) and (i). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C(7)(a) and will be appended to the facility's Permit. The permit shield allowed for at 310 CMR 7.00: Appendix C(12) shall not apply to these changes.

27. MODIFICATIONS

- A. Administrative Amendments - The Permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).
- B. Minor Modifications - The Permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d).
- C. Significant Modifications - The Permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(c).
- D. No permit revision shall be required, under any approved economic incentives program, marketable permits program, emission trading program and other similar programs or processes, for changes that are provided in this Operating Permit. A revision to the Permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Act, provided that such increases do not require an Operating Permit revision under any other applicable requirement.

28. OZONE DEPLETING SUBSTANCES

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

- A. The Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- 1) All containers containing a class I or class II substance that is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR 82.106.
 - 2) The placement of the required warning statement must comply with the requirements of 40 CFR 82.108.
 - 3) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR 82.110.
 - 4) No person may modify, remove or interfere with the required warning statement except as described in 40 CFR 82.112.
- B. The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVAC) in Subpart B:
- 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices of 40 CFR 82.156.
 - 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment of 40 CFR 82.158.
 - 3) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - 4) Persons disposing of small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152) must comply with recordkeeping requirements of 40 CFR 82.166.
 - 5) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair equipment requirements of 40 CFR 82.156.
 - 6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- C. If the Permittee manufactures, transforms, imports or exports a class I or class II substance, the Permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, "Production and Consumption Controls".
- D. If the Permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners". The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.

- E. The Permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

29. PREVENTION OF ACCIDENTAL RELEASES

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

Your facility is subject to the requirements of the General Duty Clause, under 112(r)(1) of the CAA Amendments of 1990. This clause specifies that owners or operators of stationary sources producing, processing, handling or storing a chemical in any quantity listed in 40 CFR Part 68 or any other extremely hazardous substance have a general duty to identify hazards associated with these substances and to design, operate and maintain a safe facility, in order to prevent releases and to minimize the consequences of accidental releases which may occur.

APPEAL CONDITIONS FOR OPERATING PERMIT

This Permit is an action of the MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this Permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C(6), with respect to the MassDEP's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the facility must continue to comply with all existing federal and state applicable requirements to which the facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the facility shall not be in violation of the Act for operating without a Permit.

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.

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:

The Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency) county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The 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.