



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"]:

Darvin Munger
Suddekor, LLC
240 Bowles Road
Agawam, MA 01001

INFORMATION RELIED UPON:

Application No. WE-12-016
Transmittal No. X252330
Appl.WE-14-018; Trans. #X259178
(Admin. Amend: Change Facility Contact,
Responsible Official and SIC code)
OP Minor Modification #WE-17-011;
Transmittal # X275468

FACILITY LOCATION:

Suddekor, LLC
240 Bowles Road
Agawam, MA 01001

FACILITY IDENTIFYING NUMBERS:

AQ ID: 0420314
FMF FAC NO.: 329948
FMF RO NO.:332095

NATURE OF BUSINESS:

Commercial Printing, Gravure
Hard Chromium Electroplating Process

Standard Industrial Classification (SIC): 2754,
3471

North American Industrial Classification
System (NAICS): 323111, 332813

RESPONSIBLE OFFICIAL:

Name: Darvin Munger
Title: Quality Manager Print Division

FACILITY CONTACT PERSON:

Name: Darvin Munger
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This Operating Permit shall expire on 7/11/2018.

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.*

11/9/17

Michael Gorski
Regional Director
Department of Environmental Protection
Western Regional Office

Date

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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

This operating permit has been modified to incorporate the conditions contained in Plan Approval #WE-16-010, issued February 24, 2017, which was administratively amended by Plan Approval #WE-17-016, issued September 13, 2017. Other modifications consist of:

- A correction to the stack height and maximum heat input ratings for the dryers associated with each of the two existing Giave lab development presses identified as Emission Unit (EU) 3 and EU 4.
- A change to the operating permit facility contact and responsible official.
- A Section 502(b)(10) change to the Facility's operating permit to remove the facility-wide VOC emission limit which was approved by Plan Approval Administrative Amendment #WE-16-013, issued, July 29, 2016.
- Addition of EU 6 which is a corona surface treatment device and was installed during 2015 on the lab press (EU 4)

Suddekor, LLC is a rotogravure printer which produces decorative paper utilized in the manufacture of laminate flooring in the North American laminate industry. The facility commenced operation on April 17, 2000. The existing air contaminant sources at the facility consist of:

- A seven-foot wide Kochsiek production printing press with a 5,964,421 Btu per hour natural gas-fired dryer (Emission Unit 1)
- A seven-foot wide Kochsiek production printing press with a 5,964,421 Btu per hour natural gas-fired dryer (Emission Unit 2)
- A Giave lab development press with a 1,023,642 Btu per hour natural gas-fired dryer (Emission Unit 3)
- A Giave lab development press with a 511,821 Btu per hour natural gas-fired dryer (Emission Unit 4)
- A hard chromium electroplating process and associated centrifugal spray scrubber (Emission Unit 5)

There are no volatile organic compound (VOC) or hazardous air pollutant (HAP)-containing cleanup solvents used at this facility. Only water is used for cleanup purposes. Suddekor, LLC 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 WE-12-017, issued September 12, 2012 (administratively amended by Plan Approval #WE-16-013 issued July 29, 2016). However, the United States Environmental Protection Agency (USEPA) had determined prior to the establishment of the facility-wide VOC and HAP emission limits contained in the September 2012 plan approval that the facility was a major source under the National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the USEPA's "once in always in" policy. By being a major source under the NESHAPs, Suddekor, LLC is subject to the Operating Permit and Compliance Program pursuant to 310 CMR 7.00: Appendix C(2).

Production Printing Presses

The two Kochsiek rotogravure production printing presses coat paper and plastic substrates using inks that contain VOCs and HAPs and are operating in accordance with Plan Approval #WE-17-016, issued September 13, 2017. Plan Approval #1-P-02-023, issued January 14, 2003 and Plan Approval #WE-12-017, issued September 12, 2012, (administratively amended by Plan Approval #WE-16-013 issued July 29, 2016) were superseded in their entirety by Plan Approval #WE-17-016 with the exception that the facility-wide HAP emission limitation from Plan Approval #WE-16-013 is still in effect. The production printing presses are subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry). The associated dryers to each of the production presses are exempt from plan approval pursuant to 310 CMR 7.02(2)(b)15. However, any fuel burning equipment ≥ 3 million British thermal units per hour (MMBtu/hour) of heat input will be subject to the requirements of 310 CMR 7.04(4)(a) *Inspection, Maintenance and Testing*.

Lab Printing Presses

The two Giave rotogravure lab presses are exempt from plan approval pursuant to 310 CMR 7.02(2)(b)7. since Suddekor, LLC maintains records to demonstrate that the actual emissions of VOCs and HAPs are each less than 1 ton per year. The lab presses are subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry). The associated dryers to each of the lab presses are exempt from plan approval pursuant to 310 CMR 7.02(2)(b)15. The lab presses share one exhaust stack.

Hard Chromium Electroplating Process

Suddekor conducts hard chromium electroplating of cylinders used on rotogravure printing lines. The hard chromium electroplating process was installed during March 2001 and is operating in accordance with Plan Approval #1-P-00-004, issued March 23, 2000. According to Plan Approval #1-P-00-004, the total chromium concentration from the electroplating process shall not exceed 0.015 milligrams per dry standard cubic meter. The chromium electroplating tank has a rectifier capacity of 8,000 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 a small, hard chromium electroplating operation.

The existing chromium electroplating tank is considered by EPA to be located at a major source of HAPs and subject to the provisions for existing major sources contained in 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) in accordance with 40 CFR 63.343(a)(3). The existing chromium electroplating tank is subject to the requirements for existing major sources in 40 CFR Part 63 Subpart N since EPA determined that the facility was a major source of HAPs. After Subpart N was implemented,

the facility established facility-wide HAP emission limits below major source thresholds in Plan Approval WE-12-017, issued September 12, 2012, and administratively amended by Plan Approval #WE-16-013, issued July 29, 2016.

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, only the chromium electroplating tank is subject to Subpart N.

Miscellaneous Combustion Units Less Than 3 MMBtu/hour

The facility has various natural gas-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.

Corona Treater

EU 6 consists of a 2 kilowatt Enercon Model: LM5270-D02 corona treater with an Enercon Model: LM3686-101-0M catalytic ozone decomposer that is installed on a lab press (EU 4). The corona treater emits ozone which is controlled by the catalytic ozone decomposer. The catalytic ozone decomposer is used to convert ozone in the air stream to oxygen. The unit is designed to reduce ozone levels by 99.9% or to an emission limit of 0.1 parts per million mass basis or less at the catalytic device outlet. The Enercon Model: LM5270-D02 corona treater with an Enercon Model: LM3686-101-0M catalytic ozone decomposer is subject to the requirements of 310 CMR 7.03(21).

Massachusetts Greenhouse Gas Reporting Program

The Permittee is subject to the requirements of Greenhouse Gas Emissions Reporting as defined by MassDEP in 310 CMR 7.71(3)(a).

Pursuant to 310 CMR 7.71(2) *Definitions*:

Greenhouse Gas means any chemical or physical substance that is emitted into the air and that MassDEP 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. EMISSION UNIT IDENTIFICATION

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

Table 1			
Emission Unit (EU#)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
1	Kochsiek Rotogravure Production Press and associated ink storage and mixing tanks / Natural Gas-Fired Drying Oven	350 meters of paper or plastic/minute 5,964,421 Btu/hour	None
2	Kochsiek Rotogravure Production Press and associated ink storage and mixing tanks / Natural Gas-Fired Drying Oven	450 meters of paper or plastic/minute 5,964,421 Btu/hour	None
3	Rotogravure Lab Press Giave Model: ZUM-4/600 S100//Natural Gas-Fired Drying Oven	120 meters of paper or plastic/minute 1,023,642 Btu/hour	None
4	Rotogravure Lab Press Giave Model: ZUM-4/600 S100/ Natural Gas-Fired Drying Oven	120 meter of paper or plastic/minute 511,821 Btu/hour	None
5	Hard Chromium Electroplating Process	Rectifier Capacity = 8,000 amperes	Mist eliminator and multi-stage composite mesh pad with a final stage HEPA filter
6	Enercon Model: LM5270-D02 corona treater	2 kilowatt	Enercon Model: LM3686-101-0M catalytic ozone decomposer

Table 1 Key:

- EU# = Emission Unit Number
- PCD = Pollution Control Device
- Btu = British Thermal Unit
- HEPA = High-Efficiency Particulate Air

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 3a					
EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards²	Applicable Regulation and/or Approval No
1	Paper/Plastic/ Inks	VOC	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to paper substrates shall not exceed a calendar month weighted average VOC content of 0.19 pounds per gallon of ink applied.	≤1.59 tons per month and ≤9.55 tons in any consecutive 12-month period	Plan Approval #WE-17-016(9/13/17)
			2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to plastic substrates shall not exceed a VOC content of 0.33 pounds per gallon of ink as applied.		
		Total HAPs	3. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to paper substrates shall not exceed a calendar month weighted average HAP content of 0.052 pounds per gallon of ink applied.	≤0.28 tons per month and ≤1.66 tons in any consecutive 12-month period	
			4. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to plastic substrates shall not exceed a HAP content of 0.00174 pounds per gallon of ink as applied.		
			5. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, only water shall be used for cleanup purposes.		

Table 3b

EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
1	Natural Gas	Particulate matter	None	The 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)
2	Paper/Plastic/ Inks	VOC	6. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to paper substrates shall not exceed a calendar month weighted average VOC content of 0.19 pounds per gallon of ink applied.	≤1.59 tons per month and ≤9.55 tons in any consecutive 12-month period	Plan Approval #WE-17-016(9/13/17)
			7. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to plastic substrates shall not exceed a VOC content of 0.33 pounds per gallon of ink as applied.		
		Total HAP	8. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to paper substrates shall not exceed a calendar month weighted average HAP content of 0.052 pounds per gallon of ink applied.	≤0.28 tons per month and ≤1.66 tons in any consecutive 12-month period	
			9. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the inks applied to plastic substrates shall not exceed a HAP content of 0.00174 pounds per gallon of ink as applied.		
	10. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, only water shall be used for cleanup purposes.				

Table 3c

EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
2	Natural Gas	Particulate matter	None	The 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)
3	Natural Gas	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)
4	Natural Gas	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)
1 2 3 4	Paper/Plastic/ Inks	Total HAP	11. In accordance with 40 CFR 63.825(b), 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.		Plan Approval #WE-17-016 (9/13/17) - EU 1 and EU 2 only 40 CFR 63.825(b)

Table 3d

EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
5	Chromic Acid	Chromium	12. 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)	1-P-00-004 (3/23/00) 40 CFR Part 63, Subpart N ³
6	Paper/Plastic	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)
Facility-wide		Total HAP	None	≤1.0 ton per month and ≤7.7 tons in any 12 consecutive month period	WE-16-013(7/29/16)
		Greenhouse gas ¹	NA	NA	310 CMR 7.71 (state only)

Table 3a/3b/3c/3d Key:

VOC = Volatile Organic Compounds
 HAP = Hazardous Air Pollutant
 Opacity = exclusive of uncombined water vapor
 lbs/MMBtu = pounds per Million British thermal units
 gr/dscf – grains per dry standard cubic foot
 ≤ = less than or equal to
 % = percent
 NA = Not Applicable

Table 3a/3b/3c/3d Foot Notes:

- (1) Greenhouse Gas means any chemical or physical substance that is emitted into the air and that the MassDEP 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 a consecutive 12 month period take the current calendar month amount and add it to the previous 11 calendar months total amount.
- (3) In accordance with 40 CFR 63.342(b)(1) and effective on September 19, 2014, the emission limitations in 40 CFR 63.342 apply during tank operation as defined in 40 CFR 63.341, and during periods of startup and shutdown as these are routine occurrences for affected sources subject to this subpart. In response to an action to enforce the standards set forth in this subpart, the owner or operator may assert a defense to a claim for civil penalties for violations of such standards that are caused by a malfunction, as defined in 40 CFR 63.2. Appropriate penalties may be assessed, however, if the owner or operator fails to meet the burden of proving all the requirements in the

affirmative defense. The affirmative defense shall not be available for claims for injunctive relief. An affirmative defense shall be established in accordance with 40 CFR 63.342(b)(1)(i).

B. COMPLIANCE DEMONSTRATION

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

Table 4a	
EU#	Monitoring And Testing Requirements
1 2	1. 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.
1 2	2. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
1 2 3 4	3. In accordance with DEP Approval WE-17-016 (9/13/17) and 40 CFR 63.825(b)(2), the Permittee shall demonstrate compliance with the emission standard in condition #11, Table 3c herein, by demonstrating that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with paragraphs (b)(2)(i)-(ii) of 40 CFR 63.825. The Permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows: <p style="margin-left: 20px;">a. Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2).</p> <p style="margin-left: 20px;">b. Calculate the monthly average as-applied organic HAP content, C_{ah} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3 contained in 40 CFR Part 63 Subpart KK.</p>
	4. In accordance with DEP Approval WE-17-016 (9/13/17) and 40 CFR 63.827(b)(2), the Permittee 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 style="margin-left: 20px;">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.</p> <p style="margin-left: 20px;">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.</p> <p style="margin-left: 20px;">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 MassDEP that the formulation data are correct.</p>

Table 4b	
EU#	Monitoring And Testing Requirements
5	<p>5. In accordance with 40 CFR 63.342, Table 1, the Permittee 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>6. In accordance with 40 CFR 63.343(c)(1)(ii), the Permittee shall monitor the pressure drop across the composite mesh-pad system once each day that the affected source is operating.</p> <p>7. In accordance with 40 CFR 63.343(c)(1)(iii), the Permittee 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, the Permittee 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). <p>8. In accordance with 40 CFR 63.344, the Permittee shall comply with the applicable performance test requirements and test methods contained in this section.</p>
Facility-wide	<p>9. In accordance with 310 CMR 7.71(1) and Appendix C(9), the Permittee shall 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> <p>10. In accordance with DEP Approval WE-16-013 (7/29/16), the Permittee shall monitor on a calendar month basis, the total pounds of HAP emitted from the entire facility.</p> <p>11. In accordance with DEP Approval WE-16-013 (7/29/16), the Permittee shall monitor the HAP emissions from all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.</p> <p>12. 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>

Table 4a/4b Key:

EU# = Emission Unit Number

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#	Recordkeeping Requirements
1 2	1. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain comprehensive and accurate daily records for each EU which shall include, but are not limited to: <ol style="list-style-type: none"> a. The identity, quantity, formulation and density of each ink, additive, extender and any other VOC and/or HAP-containing material applied on each EU. b. The VOC content, in units of pounds of VOC per gallon of material, of each ink, additive, extender and any other VOC-containing material applied on each EU. c. The HAP content, in units of pounds of HAP per gallon of material, of each ink, additive, extender and any other HAP-containing material applied on each EU. d. The pounds of VOCs emitted from each EU, and e. The pounds of total HAPs emitted from each EU.
	2. 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.
	3. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 3a/3b above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15th day following each month. An electronic version of the MassDEP approved recordkeeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping .
	4. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain records of monitoring and testing as required herein.
	5. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain a copy of Plan Approval WE-17-016 (9/13/17), underlying Application [Approval WE-16-010 (2/24/17) and the administrative amendment WE-17-016 (9/13/17)] and the most up-to-date SOMP for EU 1 and 2 on-site.
	6. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s). The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	7. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s). 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.
	8. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain records required by Plan Approval WE-17-016 on-site for a minimum of five (5) years.
	9. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall make records required by Plan Approval WE-17-016 available to MassDEP and USEPA personnel upon request.

Table 5b

EU#	Recordkeeping Requirements
1 2 3 4	<p>10. In accordance with 40 CFR 63.829(b) and DEP Approval WE-17-016 (9/13/17), the Permittee shall maintain the following records on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) :</p> <p>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> <p>13. In accordance with 40 CFR 63.829(f), the owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of 40 CFR 63.821(a)(2)(ii)(A) shall maintain the records specified in paragraphs (f)(1) and (f)(2) of this section for five years and submit them to the Administrator upon request:</p> <p>a. The total mass of each material applied each month on the press, including all inboard and outboard stations, and</p> <p>b. The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.</p> <p>14. In accordance with 40 CFR 63.829(g) and DEP Approval WE-17-016 (9/13/17), each owner or operator of an affected source subject to 40 CFR Part 63 Subpart KK shall maintain records of the occurrence and duration of each malfunction of operation (<i>i.e.</i>, process equipment), air pollution control equipment, or monitoring equipment.</p> <p>15. In accordance with 40 CFR 63.829(h) and DEP Approval WE-17-016 (9/13/17), each owner or operator of an affected source subject to 40 CFR Part 63 Subpart KK shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.823(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.</p>
5	<p>16. In accordance with 40 CFR 63.342(f)(3)(iv), if actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 40 CFR 63.342(f)(3)(i), the Permittee shall record the actions taken for that event.</p> <p>17. In accordance with 40 CFR 63.343(c)(1)(ii), the Permittee shall record the pressure drop across the composite mesh-pad system once each day that the affected source is operating.</p> <p>18. In accordance with 40 CFR 63.342(f)(3)(v), the Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the USEPA and MassDEP for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR Part 63 Subpart N. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (<i>i.e.</i>, superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the USEPA and MassDEP for a period of 5 years after each revision to the plan.</p>

Table 5c

EU#	Recordkeeping Requirements
5	<p>19. In accordance with 40 CFR 63.346(b)(1) through (12), (15),(16) and 63.346 (c), the Permittee 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. Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under 40 CFR 63.10(f); n. All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10, and 63.347. o. All records shall be maintained for a period of 5 years in accordance with 40 CFR 63.10(b)(1).

Table 5d	
EU#	Recordkeeping Requirements
6	15. 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 CMR 7.03 are met. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination.
Facility-wide	16. In accordance with DEP Approval WE-16-013 (7/29/16), the Permittee shall maintain comprehensive and accurate records on a calendar month basis and for each consecutive twelve month period (current month plus prior eleven months) of the total pounds of HAP emitted from the entire facility.
	17. In accordance with DEP Approval WE-16-013 (7/29/16), the actual emissions of HAP(s) recorded for each calendar month and for each consecutive twelve month period (current month plus prior eleven months) shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	18. 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.
	19. In accordance with 310 CMR 7.12(3)(b), maintain copies of Source Registration and other information supplied to the MassDEP 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.
	20. In accordance with 310 CMR 7.71(6)(b) and (c) the Permittee shall keep on site at the facility documents of the methodology and data used to quantify emissions for a period of 5 years from the date the document is created. The Permittee shall make these documents available to MassDEP upon request. (State Only Requirement).

Table 5a/5b/5c/5d Key:

EU# = Emission Unit Number
 HAP = Hazardous Air Pollutant
 PCD = Pollution Control Device
 SOMP = Standard Operating and Maintenance Procedure
 USEPA = United States Environmental Protection Agency

VOC = Volatile Organic Compounds

Table 6a

EU#	Reporting Requirements
1 2	<p>1. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall submit to MassDEP an annual report postmarked by no later than January 30th of each year, which minimally contains for the prior consecutive twelve-month period the following information:</p> <ul style="list-style-type: none"> a. The calendar month weighted average VOC content, in units of pounds of VOC per gallon of material, and calendar month weighted average organic HAP content, in units of pounds of organic HAP per gallon of material, for the inks applied to paper substrates on EU 1 during each month. b. The calendar month weighted average VOC content, in units of pounds of VOC per gallon of material, and calendar month weighted average organic HAP content, in units of pounds of organic HAP per gallon of material, for the inks applied to paper substrates on EU 2 during each month. c. The VOC and total HAP emissions from EU 1 during each month and in each consecutive twelve-month period. d. The VOC and total HAP emissions from EU 2 during each month and in each consecutive twelve-month period. <p>Associated calculations and all supporting data may be required to be submitted upon request by MassDEP or USEPA.</p> <p>2. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall submit to MassDEP all information required by Plan Approval WE-17-016 over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).</p> <p>3. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall provide a copy to MassDEP of any record required to be maintained by Plan Approval WE-17-016 within 30 days from MassDEP’s request.</p> <p>4. In accordance with DEP Approval WE-17-016 (9/13/17), 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 4 Monitoring and Testing Requirements herein.</p> <p>5. In accordance with DEP Approval WE-17-016 (9/13/17), 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 4 Monitoring and Testing Requirements herein.</p>
1 2 3 4	<p>6. In accordance with 40 CFR 63.830(b)(6), the Permittee 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. Exceedances of the criterion of 40 CFR 63.821(a)(2)(ii)(A). c. 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>7. 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>

Table 6b

EU#	Reporting Requirements
5	<p>8. In accordance with 40 CFR 63.342(b)(1)(ii), the Permittee seeking to assert an affirmative defense shall submit a written report to MassDEP and the USEPA with all necessary supporting documentation, that it has met the requirements set forth in 40 CFR 63.342(b)(1)(i). This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmation defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.</p> <p>9. In accordance with 40 CFR 63.342(f)(3)(iv), if actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 40 CFR 63.342(f)(3)(i), the Permittee shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. The report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the USEPA and MassDEP.</p> <p>10. In accordance with 40 CFR 63.347(d), the Permittee 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>11. In accordance with 40 CFR 63.347(f)(2), 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>12. In accordance with 40 CFR 63.347(f)(3)(i), within 60 days after the date of completing each performance test (defined in § 63.2) as required by this 40 CFR Part 63 Subpart N, the Permittee must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of the EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk, flash drive or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to the EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including the confidential business information, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test to the Administrator at the appropriate address listed in § 63.13.</p> <p>13. In accordance with 40 CFR 63.347(g)(1), the Permittee 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 the permittee 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. <p>All summary reports shall be delivered or postmarked by the 30th day following the end of each calendar half.</p>

Table 6c	
EU#	Reporting Requirements
5	<p>14. In accordance with 40 CFR63.347(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.
Facility-wide	<p>15. In accordance with DEP Approval WE-16-013 (7/29/16), the Permittee shall provide a copy to MassDEP of any record required to be maintained by Plan Approval WE-16-013, concerning facility-wide HAPs, within 30-days from MassDEP's request.</p> <p>16. Submit a Source Registration/Emission Statement Form to MassDEP on an annual basis as required by 310 CMR 7.12.</p>

Table 6d	
EU#	Reporting Requirements
Facility-wide	17. 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 MassDEP'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.
	18. 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).
	19. Submit Annual Compliance report to MassDEP and EPA by January 30 of each year and as required by General Condition 10 of this Permit.
	20. In accordance with 310 CMR 7.71(5), the Permittee shall electronically submit and certify by April 15 th of each year a greenhouse gas emissions report to MassDEP. (State Only Requirement).

Table 6a/6b/6c/6d Key:

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 64.2(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 3a/3b/3c/3d, 4a/4b, 5a/5b/5c/5d, and 6a/6b/6c/6d:

Table 8a	
EU	Special Terms and Conditions
1 2 3 4	1. EU 1, EU 2, EU 3 and EU 4 are 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 requirements.
1 2	2. In accordance with DEP Approval WE-17-016 (9/13/17), EU 1 and EU 2 shall consist of the equipment specified in Table 1 herein.
	3. In accordance with DEP Approval WE-17-016 (9/13/17) and pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, EU 1 and EU 2 shall only be used to apply inks to paper and/or plastic substrates.
	4. In accordance with DEP Approval WE-17-016 (9/13/17) and pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the ink mixing tanks associated with EU 1 and EU 2 shall be equipped with a lid, or other method approved by MassDEP.
	5. In accordance with DEP Approval WE-17-016 (9/13/17) and pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the lid for each ink mixing tank associated with EU 1 and EU 2 shall: <ul style="list-style-type: none"> a. extend at least 0.5 inch beyond the outer rim of the tank or be attached to the rim of the tank; and, b. be maintained so that when in place, the lid maintains contact with the rim of the mixing tank for at least 90% of the rim's circumference; and, c. if necessary, have an opening to allow for insertion of a mixer shaft, which opening shall be covered after insertion of the mixer, except to allow adequate clearance for the mixer shaft.
	6. In accordance with DEP Approval WE-17-016 (9/13/17) and 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: <ul style="list-style-type: none"> a. Store all VOC and/or HAP-containing inks, 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 inks, 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 inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials; d. convey VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; e. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing inks, 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.
	7. In accordance with DEP Approval WE-17-016 (9/13/17) and pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the maximum capacity of any bucket, pitcher, or other type of container used for transferring ink during the color matching process shall not exceed 5 gallons of ink at any time.
	8. In accordance with DEP Approval WE-17-016 (9/13/17), any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval (WE-17-016, issued 9/13/17). The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval (WE-17-016, issued 9/13/17).

Table 8b

EU	Special Terms and Conditions															
1 2	<p>9. In accordance with DEP Approval WE-17-016 (9/13/17) , the Permittee shall install and use an exhaust stack, as required in Table 8b, condition #10 herein, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.”</p> <p>10. In accordance with DEP Approval WE-17-016 (9/13/17), the Permittee shall install and utilize exhaust stacks with the following parameters for EU 1 and EU 2:</p> <table border="1" data-bbox="284 695 1463 884"> <thead> <tr> <th data-bbox="284 695 380 800">EU</th> <th data-bbox="380 695 586 800">Stack Height Above Ground (feet)</th> <th data-bbox="586 695 834 800">Stack Inside Exit Dimensions (feet)</th> <th data-bbox="834 695 1133 800">Stack Gas Exit Velocity Range (feet per second)</th> <th data-bbox="1133 695 1463 800">Stack Gas Exit Temperature Range (°F)</th> </tr> </thead> <tbody> <tr> <td data-bbox="284 800 380 842">1</td> <td data-bbox="380 800 586 842">40</td> <td data-bbox="586 800 834 842">2.5 diameter</td> <td data-bbox="834 800 1133 842">69</td> <td data-bbox="1133 800 1463 842">100-230</td> </tr> <tr> <td data-bbox="284 842 380 884">2</td> <td data-bbox="380 842 586 884">40</td> <td data-bbox="586 842 834 884">2.5 diameter</td> <td data-bbox="834 842 1133 884">69</td> <td data-bbox="1133 842 1463 884">100-230</td> </tr> </tbody> </table>	EU	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)	1	40	2.5 diameter	69	100-230	2	40	2.5 diameter	69	100-230
EU	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)												
1	40	2.5 diameter	69	100-230												
2	40	2.5 diameter	69	100-230												
5	<p>11. EU 5 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>12. In accordance with 40 CFR 63.342(a)(1), at all times, the Permittee must operate and maintain any affected source subject to 40 CFR Part 63 Subpart N, 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 the Permittee 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 USEPA and MassDEP 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> <p>13. In accordance with 40 CFR 63.342(f)(1)(i) through (iii),</p> <ul style="list-style-type: none"> 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. b. Malfunctions shall be corrected as soon as practicable after their occurrence. 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>14. In accordance with 40 CFR 63.342(f)(3)(i), the Permittee shall prepare, an operation and maintenance plan. The plan shall include the elements specified in 40 CFR 63.342(f)(3)(i)(A) through (F).</p> <p>15. In accordance with 40 CFR 63.342(f)(3)(ii), if the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.</p>															

Table 8c	
EU	Special Terms and Conditions
5	<p>16. In accordance with 40 CFR 63.343(a)(8), after March 19, 2013, the Permittee of an affected source that is subject to the standards in paragraphs 40 CFR 63.342(c) or (d) shall implement the housekeeping procedures specified in Table 2 of 40 CFR 63.342.</p> <p>17. 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>
1 2 3 4 5	<p>18. EU 1, 2, 3 and 4 are 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]. EU 5 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]. Compliance with all applicable provisions therein is required.</p>

Table 8a/8b/8c Key:

EU = Emission Unit Number
 CFR = Code of Federal Regulations
 BWP = Bureau of Waste Prevention
 VOC = Volatile Organic Compound
 HAP = Hazardous Air Pollutant

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:

- 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

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.

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. Additionally, the request must state why the Permit is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to The Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

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.