



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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

DEVAL L. PATRICK  
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Secretary

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### MODIFICATION TO FINAL AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("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"]:**

The Gillette Company – Andover  
Manufacturing Center (AMC)  
30 Burtt Road  
Andover, Massachusetts 01810

**INFORMATION RELIED UPON:**

Application No. MBR-95-OPP-041RMAA  
Transmittal No. W216445, X251815,  
X253487 and X262154

**FACILITY LOCATION:**

The Gillette Company – Andover  
Manufacturing Center  
30 Burtt Road  
Andover, MA 01810

**FACILITY IDENTIFYING NUMBERS:**

AQ ID: 1210063  
FMF FAC NO. 130128  
FMF RO NO. 53645

**NATURE OF BUSINESS:**

Manufacture of personal care products

**NORTH AMERICAN INDUSTRY  
CLASSIFICATION SYSTEM (NAICS)**

325620

**RESPONSIBLE OFFICIAL:**

Name: Mr. Michael C. Eriksen  
Title: Plant Manager

**FACILITY CONTACT PERSON:**

Name: Mr. Travis Gombos  
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**This Operating Permit shall expire on July 30, 2014.**

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.

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Susan Ruch  
Deputy Regional Director, Bureau of Waste Prevention

Date: July 10, 2014

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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.

### **DESCRIPTION OF FACILITY AND OPERATIONS**

The Gillette Company-Andover Manufacturing Center (AMC) is located at 30 Burt Road in Andover. AMC manufactures shaving products, aerosol deodorants, antiperspirants and hair care products. AMC is not a major hazardous air pollutant (HAP) source.

MassDEP issued a Plan Approval (MBR-09-IND-011) to the Permittee, dated October 19, 2009. This Approval governs modifications at the existing facility. The modifications are as follows: Line 1 remains physically connected to the existing regenerative thermal oxidizer (RTO) for use during the production of shave creams, but during production of shave gels, the gas room emissions will be directed to atmosphere as the production of shave gels utilizes compressed air as the propellant rather than volatile organic compounds (VOC); Line 4 has been physically disconnected from the existing RTO, because it is only used to produce shave gels which utilizes compressed air as the propellant; all VOC injection lines previously routed to Line 4 have been physically removed prior to connecting Line 3 to the existing RTO. Line 3 was installed to produce VOC-containing products such as deodorants, anti-perspirants, and hair sprays.

The facility consists of four (4) aerosol can filling lines, three (3) non- aerosol hair care lines, including one water based line and one exempt line (i.e. less than 1 ton per year of volatile organic compound emissions), and a tank farm. The tank farm includes four (4) ethanol tanks, four (4) propellant tanks and a blowing agent tank.

Table 3 contains the emission unit emission limits and restrictions. Table 4 contains monitoring/testing requirements. Table 5 contains record keeping requirements. Table 6 contains reporting requirements. Table 7 contains the requirements that are not currently applicable.

### **2. EMISSION UNIT IDENTIFICATION**

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

<b>Table 1</b>			
<b>Emission Unit (EU)</b>	<b>Description of Emission Unit</b>	<b>EU Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU1	Cleaver Brooks Boiler # CB 665-700	29.291 million British thermal units per hour (MMBtu/hr)	None
EU2	Cleaver Brooks Boiler # CB 665-700	29.291 MMBtu/hr	
EU3	Cleaver Brooks Boiler # CB 665-700	29.291 MMBtu/hr	
EU4	Simonds Resource Recovery Facility	1,400 pounds (lbs) Type 0 waste per hour, 400 lbs Type 5 waste per hour	
EU5	Line #1 manufactures shave cream, shave gel, deodorant, anti-perspirant, and hair spray. Line #1 is controlled by PCD-1 when manufacturing shave cream; emits no VOC when manufacturing shave gel; and is uncontrolled when manufacturing deodorant, anti-perspirant, or hair spray, while complying with the emission limits in Table 3 below.	Maximum filling of 250 cans per minute of shave cream, shave gel, deodorant, anti-perspirant, or hair spray	Anguil Environmental Systems 50 regenerative thermal oxidizer (RTO) (PCD1) and Permanent Total Enclosure (PTE) on Sepro filling
EU6	Line #2 Aerosol Can Filling – Kartridge Pak, having capability for TTV filling	730 gallons propellant per hour 7,500 lbs concentrate per hour	None
EU7	Line #4 only manufactures shave gels. Since there are no longer any VOC emissions to control, the process air from this line is now vented directly to ambient.	Maximum filling of 250 cans per minute of shave gel	None
EU8	Liquid Mix Room	22,244,000 gallons solvent per year	None
EU9	Leak Check Inspection (LCI) Booth	10 cans per hour	

<b>Table 1</b>			
<b>Emission Unit (EU)</b>	<b>Description of Emission Unit</b>	<b>EU Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU10	Pilot Lab	95 gallons propellant per hour 116 gallons concentrate per hour	None
EU11	Tank Farm Storage Tanks – four identical above ground tanks (Tank Nos. V-106, V-107, V-108, and V-109) holding ethanol)	12,000 gallons each	
EU12A	Tank Farm Propellant Tank (Tank No. V-105) above ground tank holding A-70 propellant	30,000 gallons	Vapor Recovery System (PCD2)
EU12B	Tank Farm Propellant Tank (Tank No. V-104) above ground tank holding 152A propellant	30,000 gallons	None
EU12C	Tank Farm Blowing Agent Tank (Tank No. V-101) above ground tank holding a blowing agent	30,000 gallons	
EU12D	Tank Farm Propellant Tank (Tank No. V-102) above ground tank holding A-46 propellant	25,000 gallons	
EU12E	Tank Farm Propellant Tank (Tank No. V-103) above ground tank holding A-31 propellant	25,000 gallons	
EU13	Cummings H6-1F Fire Pump No. 3	4 gallons of fuel oil per hour	
EU14	Cummings NH-220 Fire Pump No.2	4 gallons of fuel oil per hour	
EU15	Onan 15OJC-18R/9549AA emergency generator No. 1	< 3 MMBtu/hr	
EU16	Onan 15OJC-4XR/24391AB emergency generator No. 2	< 3 MMBtu/hr	
EU17	Aerosol Can Filling Line No. 5	100 units per minute	
EU19	Date Coding	409,968,000 units per year	

<b>Table 1</b>			
<b>Emission Unit (EU)</b>	<b>Description of Emission Unit</b>	<b>EU Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU21	Non-Aerosol Hair Care Line No. 20	125 units per minute	None
EU22	Line #3 is a new line that manufactures deodorant, anti-perspirant, and hair spray. The process air from Line #3 is captured within a PTE and controlled by PCD1 at all times.	Maximum filling of 250 cans per minute of deodorant, anti-perspirant, or hair spray	PCD1 and PTE

Table 1 Key:  
 # = Number

### **3. IDENTIFICATION OF EXEMPT ACTIVITIES**

The following have been found to be exempt activities as provided in 310 CMR 7.00:Appendix C(5)(h):

<b>Table 2</b>	
<b>Description of Exempt Activities</b>	<b>Reason</b>
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 the exempt activities list shall be kept at the facility and a copy shall be submitted to 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. EMISSION LIMITS AND RESTRICTIONS**

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

<b>Table 3</b>					
EU #	Allowable fuel or Raw Material	Restrictions	Pollutant	Emission Limit/Standard	Applicable Regulations and/or Approval No.
EU1, EU2, EU3	Distillate oil, Residual oil and/or natural gas	Please see Section 5.A of this Permit for fuel usage restrictions	SO <sub>2</sub>	32.7 tons/month combined, 96.7 tons/12 month rolling period combined	MBR-94-RES-141
			NO <sub>x</sub>	16.5 tons/month combined, 43.3 tons/12 month rolling period combined	
			PM	0.15 pounds/MMBtu	310 CMR 7.02(8)
	Residual fuel oil	NA	Sulfur in fuel	≤ 1.0 % by weight	MBR-94-RES-141
EU4 <sup>1</sup>	Natural gas, Type 0 <sup>2</sup> waste and Type 5 <sup>3</sup> waste	336,000 lb waste per month 4,032,000 lb waste per 12 month rolling period	NA	NA	MBR-94-RES-141
		NA	Particles	< 100 microns in dimension	310 CMR 7.06(2)(c)
		NA	Smoke	< No. 1 of the Chart <sup>4</sup> at any time	310 CMR 7.06(2)(a)
		NA	Opacity	≤ 20 % opacity at any time	310 CMR 7.06(2)(a)
		Unit shall be operated a maximum of 8 hours per day	Particulate emissions	0.10 grains per standard cubic foot at 12% CO <sub>2</sub>	MBR-81-INC-010
EU5	NA	Uncontrolled Emissions from manufacturing deodorant, anti- perspirant, and hair spray	VOC	≤ 0.15 ton per month ≤ 1.5 tons per twelve month rolling period	MBR-09-IND-011 310 CMR 7.18(17)

**Table 3**

EU #	Allowable fuel or Raw Material	Restrictions	Pollutant	Emission Limit/Standard	Applicable Regulations and/or Approval No.
EU5, EU22	NA	After control by PCD-1 and PTE	VOC	$\leq 0.25$ ton per month $\leq 2.0$ tons per twelve month rolling period	MBR-09-IND-011
EU6	VOC-containing propellant	Restricted to through-the-valve filling for all products that are or have ever been successfully TTV-filled	VOC	NA	MBR-92-IND-053 310 CMR 7.18(17)
EU9	VOC-containing product	NA	VOC	$\leq 0.5$ ton per month, $\leq 3.0$ tons per rolling twelve month period	MBR-01-IND-020
EU13, EU14	Diesel fuel oil	$\leq 167$ gallons per month, combined $\leq 2000$ gallons per consecutive twelve month period, combined	Sulfur in fuel	$\leq 0.3$ % by weight	MBR-94-RES-141



**Table 3**

EU #	Allowable fuel or Raw Material	Restrictions	Pollutant	Emission Limit/Standard	Applicable Regulations and/or Approval No.
EU15, EU16	Propane	<p>≤ 200 hours of operation per month, each                      ≤ 300 hours of operation per twelve month rolling period, each, during normal operations.                      In addition these units shall not be used as load shaving units, peaking power production units or as standby engines in an energy assistance program.</p>	NA	NA	MBR-94-RES-141
EU17	VOC-containing product	NA	VOC	<p>≤ 3 tons per month,                      ≤ 4.9 tons per rolling twelve month period</p>	MBR-07-IND-004
EU19	inks	NA	VOC	<p>≤ 1 ton per month,                      ≤ 5 tons per rolling twelve month period</p>	MBR-92-IND-053 310 CMR 7.18(17)
EU21	VOC-containing product			<p>≤ 0.75 tons per month,                      ≤ 1.5 tons per rolling twelve month period</p>	Opacity
	NA	NA			

<b>Table 3</b>					
EU #	Allowable fuel or Raw Material	Restrictions	Pollutant	Emission Limit/Standard	Applicable Regulations and/or Approval No.
EU22	NA	After control by PCD-1 and PTE	VOC	$\leq 0.12$ ton per month $\leq 1.2$ tons per twelve month rolling period	MBR-09-IND-011
Facility-Wide	NA	NA	VOC	50 tons per month 150 tons per 12 month rolling period	MBR-92-IND-053 310 CMR 7.18(17)
			Any single HAP	5 tons per month < 10 tons per 12 month rolling period	MBR-06-IND-004 Application No. MBR-95-OPP-041
			Total HAPs	9 tons per month < 25 tons per 12 month rolling period	MBR-95-OPP-041
			SO <sub>2</sub>	$\leq 33$ tons per month $\leq 99$ tons per 12 month rolling period	MBR-94-RES-141
			NO <sub>x</sub>	$\leq 17$ tons per month $\leq 49$ tons per 12 month rolling period	
			Smoke	< No. 1 of Chart <sup>4</sup> , except No. 1 to < No. 2 of Chart for $\leq$ six (6) minutes during any one hour	310 CMR 7.06(1)(a)
			Opacity	$\leq 20$ percent except 20 to $\leq 40$ percent for $\leq$ two (2) minutes during any one hour	310 CMR 7.06(1)(b)
			Sulfur in fuel	$\leq 0.17$ lb sulfur per MMBtu heat release potential	310 CMR 7.05(1)(a)2.
			Sulfur in fuel	$\leq 0.55$ lb sulfur per MMBtu heat release potential	310 CMR 7.05(1)(a)1.
			No. 2 fuel oil		
No. 4 fuel oil, No. 6 fuel oil					

<b>Table 3</b>					
EU #	Allowable fuel or Raw Material	Restrictions	Pollutant	Emission Limit/Standard	Applicable Regulations and/or Approval No.
Facility- Wide	Isobutane and Propane	Please see Section 5, "Special Terms and Conditions" of this Permit	NA	NA	40 CFR Part 68

Table 3 Key:

- HAP = Hazardous Air Pollutant
- NO<sub>x</sub> = nitrogen oxides
- SO<sub>2</sub> = sulfur dioxide
- VOC = volatile organic compounds
- lb = pound
- ≤ = less than or equal to
- < = less than
- NA = not applicable
- MMBtu = million British thermal units

- 1: The Permittee must be in possession of and in compliance with the appropriate and active Hazardous Waste Recycling Permit(s) obtained from the Department (State-Only requirement).
- 2: "Type 0 waste" means trash, a mixture of highly combustible waste such as paper, cardboard, cartons, wood boxes and combustible floor sweepings, containing approximately ten per cent moisture and five per cent incombustible solids, and having a heating value of approximately 8500 British thermal units per pound as fired, and deriving from commercial and industrial activities. The mixtures contain up to ten per cent by weight of plastic bags, coated paper, laminated paper, treated corrugated cardboard, oily rags and plastic or rubber scraps.
- 3: "Type 5 waste" means by-product waste, gaseous, liquid or semi-liquid such as tar, paints, solvents, sludge, fumes, and so forth, from industrial operations.
- 4: Chart means the Ringelmann Scale for grading the density of smoke, as published by the United States Bureau of Mines and as referred to in the Bureau of Mines Information Circular No. 8333, or any smoke inspection guide approved by the Department.

**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:

<b>Table 4</b>	
EU #	MONITORING/TESTING REQUIREMENTS
EU1, EU2, EU3	1) Monitor fuel oil and natural gas usage for the boilers on a monthly and twelve month rolling period (current month plus the sum of the previous eleven months) as referenced in Approval MBR-94-RES-141. Said monitoring shall also include the sulfur content of the fuel oil used and a calculation of the resulting emissions from said usage so that compliance with the record keeping requirements in Table 5, No. 1 of this Permit shall be maintained.
	2) Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2., monitor unit operations to ensure continuous compliance with the particulate matter emission limits contained in Table 3 of this Permit.
	3) Inspect and maintain any fuel utilization facility, having an energy input capacity of $\geq 3$ MMBtu per hour in accordance with manufacturer's recommendations and test for efficient operation at least once in each calendar year as provided in 310 CMR 7.04(4)(a) incorporated herein by reference.
EU4	4) Monitor the amount of waste consumed on a monthly and twelve month rolling basis as referenced in Approval MBR-94-RES-141, Section F.
EU4	5) Monitor records of hours of operation per day to determine compliance status with Approval MBR-81-INC-010.
	6) Perform emissions testing at least once per year. Said testing shall include stack testing for non-condensable and condensable particulates and hydrogen chlorides as required by 310 CMR 7.13 Stack Testing Test Approval issued by MassDEP to the Permittee on November 4, 1997.
EU5, EU22	7) PCD-1's minimum combustion temperature, measured at the downstream end of the combustion chamber, shall be recorded with temperature monitoring and recording equipment using a digital readout and stored on a computerized flash card or disc as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.1 and 40 CFR 64.9 (CAM).
	8) In accordance with 40 CFR 64.3 (CAM), the chamber temperature shall be monitored with a thermocouple. Accuracy of the thermocouple shall be verified by a second, or redundant, thermocouple probe inserted into the oxidizer chamber with a hand held meter. This validation check shall be conducted at least annually. The acceptance criterion is $\pm 15^{\circ}\text{F}$ .
	9) That all bypass stack usage associated with PCD-1 shall be monitored and recorded with the date, time, and duration of each bypass stack usage. AMC shall notify the MassDEP by telephone within one business day of a bypass stack usage indicating the reason for usage and approximate duration of usage as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.2.
	10) Complete additional emissions testing of PCD-1 and the associated PTEs, at least once every three years or whenever MassDEP otherwise deems such as necessary as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.3.

<b>Table 4</b>	
EU #	MONITORING/TESTING REQUIREMENTS
EU5, EU22	11) A written pretest protocol must be submitted to this Office for MassDEP approval at least 30 days prior to any required compliance test. The pre-test protocol shall include, but not be limited to, a description of: the emission compliance testing program proposed, applicable emission limits for which testing and demonstration of compliance is required, sampling point locations, sampling equipment, analytical procedures, proposed test methods, the proposed operating conditions for the required testing and identity of the independent third party testing company as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.4.
	12) A final emission compliance test results report shall be submitted to this Office, attention Permit Chief for the Bureau of Waste Prevention, within 60 days after the completion of each required compliance test. The final emission compliance test report shall include, but not be limited to, a description of: the emission compliance testing program conducted, applicable emission limits for which testing was required and a summary of test results demonstrating compliance and/or noncompliance with applicable limits, sampling point locations, sampling equipment, analytical procedures, actual test methods used, and the actual operating conditions for which the testing was conducted as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.5.
	13) Monitor monthly records to demonstrate that the VOC and HAP emissions do not exceed the emission levels specified in Table 2 of Approval MBR-09-IND-011. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and HAP's for the month as well as the prior 11 months as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.6.
EU5 (Uncontrolled)	14) Monitor monthly records to demonstrate that the VOC and HAP emissions do not exceed the emission levels specified in Table 2 of Approval MBR-09-IND-011. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and HAP's for the month as well as the prior 11 months as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.7.
EU22	15) Monitor monthly records to demonstrate that the VOC and HAP emissions do not exceed the emission levels specified in Table 2 of Approval MBR-09-IND-011. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and HAP's for the month as well as the prior 11 months as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.8.

<b>Table 4</b>	
EU #	MONITORING/TESTING REQUIREMENTS
EU5, EU7, EU22	16) Monitor facility operations such that compliance with the restrictions and emission limitations/standards contained in Table 2 of this Approval can be determined as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.9.
	17) Monitor operations such that information may be compiled for the preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12 as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.10.
	18) Perform Emissions Compliance Testing (Stack Testing), in accordance with 310 CMR 7.13, and 40 CFR Part 60, Appendix A or any other testing if and when requested by MassDEP or EPA as referenced in Approval MBR-09-IND-011, Table 3, Monitoring/Testing Requirements No.11.
EU5, EU6, EU7	19) Monitor that seal-less booster pumps are being utilized as required in Approval MBR-92-IND-053, Proviso No. I.6 and Application MBR-95-OPP-041.
	20) Monitor operations of its Reduced Pump Pressure Program as referenced in Approval MBR-92-IND-053, Proviso No. I. 7. Under this program the Permittee must post next to each filling line the optimal matrix of pump pressures as a function of can size and fill speed (which itself is a function of numerous variables, such as aerosol valve configuration). The Permittee must update its matrices as necessary. Copies of all matrices, including outdated matrices, must be included in the RACT Compliance Files for at least five (5) years and must be available for MassDEP and EPA review. MassDEP and EPA may review the matrices as posted next to the gassing rooms, as well. The Permittee 's Changeover Procedures shall be revised to require use of the matrix. This SOP for Changeover Procedures must also be available for MassDEP and EPA review as referenced in Application MBR-92-IND-053, Proviso No. I. 7.
	21) Monitor gas room safety venting as referenced in Approval MBR-92-IND-053, Proviso No. I. 10. Specifically, the gas room operator's initials, date, time, reason, location, and approximate amount of VOC that is vented must be documented. Actively used records must be kept by each filling room, and accumulated records must be stored in the RACT Compliance Files for at least five (5) years and made available for MassDEP and EPA review as referenced in Approval MBR-92-IND-053, Proviso No. I. 10.
	22) Monitor records of attendance lists of the required semi-annual Gas Room Operator (GRO) Training (formerly known as Hydrocarbon Safety Training) as referenced in Approval MBR-92-IND-053, Proviso No. I. 20.
	23) The Permittee must continue use of its comprehensive Aerosol Filling Room Leak Detection and Repair Program (AFRLDRP). The AFRLDRP must be conducted at least semi-annually on all gassing room pipeline hardware as referenced in Approval MBR-92-IND-053, Proviso No. I.8. Monitor the dates that the AFRLDRP are conducted to verify that it is being conducted at least semiannually as required.

<b>Table 4</b>	
EU #	MONITORING/TESTING REQUIREMENTS
EU9	<p>24) In order to document the compliance status of EU9 with respect to the VOC emission limits established in Table 3 of this Permit, monitor at least the following information:</p> <ul style="list-style-type: none"> <li>a. Number of cans sprayed out on a monthly basis,</li> <li>b. Number of cans sprayed out on a twelve month rolling basis,</li> <li>c. Pounds of VOC emitted on a monthly basis,</li> <li>d. Pounds of VOC emitted on a twelve month rolling basis,</li> </ul> <p>as referenced in Approval MBR-01-IND-020, Special Condition No. 4.</p>
EU11, EU12A, EU12B, EU12C, EU12D, EU12E	<p>25) Monitor operations to assure that tank truck and rail car hatches are kept closed except during loading or unloading as referenced in Approval MBR-92-IND-053, Proviso No. I.14.</p> <p>26) Monitor operations so that new Tank Farm operators are taught the Propellant and Ethanol Tank Farm Emission Minimization Program within the first week of a new Tank Farm operator’s hiring/transfer, whenever a new person is assigned to the Tank Farm for a period of longer than one month as referenced in Approval MBR-92-IND-053, Proviso No. I.20.</p> <p>27) As part of its Tank Farm Leak Detection and Repair Program (TFLDRP), which includes both propellant and ethanol fugitive emission sources, the Permittee must inspect all components of the Tank Farm and outdoor piping on a semi-annual basis as referenced in Approval MBR-92-IND-053, Proviso No. I.9.</p>
EU12A, EU12B, EU12C, EU12D, EU12E	<p>28) The Tank Farm operator must monitor information about each tank truck delivery, including the date, propellant type and the operator's initials as referenced in Approval MBR-92-IND-053, Proviso No. I.13.</p>
EU13, EU14	<p>29) Monitor fuel oil usage for the fire pumps on a monthly and twelve month rolling period (current month plus the sum of the previous eleven months). Said monitoring shall also include the sulfur content of the fuel oil used and a calculation of the resulting emissions from said usage as referenced in Approval MBR-94-RES-141, Section F.</p>
EU15, EU16	<p>30) Monitor the actual hours of operation on a monthly and twelve month rolling basis based on reading from the cumulative timers on the units, including any routine monthly startup testing for the two propane generators as referenced in Approval MBR-94-RES-141, Section F.</p>
EU1, EU2, EU3, EU4,	<p>31) Monitor to ensure that fuel purchase receipts are kept for each unit as referenced in Approval MBR-94-RES-141, Section F.</p>

<b>Table 4</b>	
EU #	MONITORING/TESTING REQUIREMENTS
EU13, EU14, EU15, EU16	32) Equipment or emissions monitoring systems used for the purposes of documenting compliance with restrictions/emission limits in Table 3 of this Permit shall be calibrated, maintained and operated in sufficient manner to ensure continuous and accurate operation at all times as referenced in Approval MBR-94-RES-141, General Condition I.
EU19	33) Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C (9)(b)2, monitor VOC emissions from facility-wide date coding operations so that compliance with the VOC emission limits set forth in Table 3 of this Permit shall be demonstrated.
Facility-Wide	34) Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2, monitor operations such that the records of the facility-wide VOC, HAP, SO <sub>2</sub> , and NO <sub>x</sub> emissions on a monthly and 12 month rolling period are maintained so that compliance with the emission limits in Table 3 of this Permit shall be documented.
	35) Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2, monitor facility operations for instances of deviation from Permit requirements.
	36) When a new aerosol-packaged product is considered for introduction, the standard testing procedures must include evaluation of the technical feasibility of TTV filling. If technically feasible, the new product must be TTV-filled as referenced in Approval MBR-92-IND-053, Proviso No. I.3.
	37) Monitor alcohol usage on a monthly basis in the RACT Compliance Files for at least five (5) years and be made available for MassDEP and EPA inspection as referenced in Approval MBR-92-IND-053, Proviso No. I.15.
	38) Perform or have performed Emissions Compliance Testing (Stack Testing), in accordance with 310 CMR 7.13, 310 CMR 7.19(13)(c), and 40 CFR Part 60, Appendix A (TSP -Methods 1 through 5, NO <sub>x</sub> – Method 7E, CO - Method 10, Opacity – Method 9, SO <sub>2</sub> - Method 6C, O <sub>2</sub> - Method 3A) or any other testing if and when requested by MassDEP or EPA.
	39) Inspect and maintain each fuel utilization facility, having an energy input capacity of $\geq 3$ MMBtu /hr in accordance with manufacturer's recommendations and test for efficient operation at least once in each calendar year as provided in 310 CMR 7.04(4)(a) incorporated herein by reference.
	40) Monitor operations to assure that stem seal adapters are being used for its entire current shave cream (non-gel) products as referenced in MBR-92-IND-053, Proviso No. I.12. The Permittee must also monitor that for any new shave cream (non-gel) products, stem seal adapters are evaluated for technical feasibility, and used if technically feasible as referenced in Approval MBR-92-IND-053, Proviso No. I.12.



**Table 4**

EU #	MONITORING/TESTING REQUIREMENTS
Facility-Wide	41) Monitor propellant and ethanol emissions so that at any time, should the Permittee calculate that its estimated annual propellant and ethanol emissions are greater than 90% of its emissions cap of 150 tons per rolling twelve month period (i.e. 135 tons), the Permittee shall notify MassDEP and EPA of this in writing as referenced in Approval MBR-92-IND-053, Proviso No. I.17.
	42 ) Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2, monitor the feasibility of implementing alternative technologies or reformulated raw material inputs which will lead to the decrease of overall emissions from the subject facility to the environment (air emissions, solvent waste, etc.). The Permittee shall seek assistance from outside sources such as suppliers, vendors, or the Office of Technical Assistance (which is located at the Executive Office of Environmental Affairs, 100 Cambridge Street, Boston, Massachusetts, Telephone No. 617-727-3260).
	43) Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2, monitor facility-wide HAP emissions. At a minimum, the information monitored shall include the HAP-containing materials used during the month, the HAP content of each material, and the actual emissions of HAPs for the current month plus the prior 11 months.
	44) Pursuant to MassDEP's authority through 310 CMR 7.00:Appendix C(9)(b)2., monitor the sulfur content of each new shipment of fuel oil received. Compliance with sulfur content shall be demonstrated through testing or maintaining a shipping receipt from the fuel supplier. The shipment certification or testing of sulfur content of fuel oil shall be in accordance with the applicable American Society for Testing Materials (ASTM) test methods or any other method approved by MassDEP and EPA.
	45) Pursuant to MassDEP's authority through 310 CMR 7.00:Appendix C(9)(b)2., monitor facility operations such that information may be compiled for the annual preparation of a Source Registration/Emission Statement as required by 310 CMR 7.12. Keep copies of all information supplied to MassDEP pursuant to 310 CMR 7.12 on site for five (5) years after the date the report is submitted.

<b>Table 4</b>	
EU #	MONITORING/TESTING REQUIREMENTS
Facility-Wide	<p>46) Monitor facility operations such that the records of all monitoring data and supporting information on site for a period of at least five (5) years from the date of the monitoring sample, measurement, report or Operating Permit Renewal Application. Supporting information includes at a minimum, all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit, and any other information required to interpret the monitoring data. Records required to be maintained shall include, where applicable:</p> <ul style="list-style-type: none"> <li>a) The date, place as defined in the Permit, and time of sampling or measurements;</li> <li>b) The date(s) analyses were performed;</li> <li>c) The company or entity that performed the analyses;</li> <li>d) The analytical techniques or methods used;</li> <li>e) The results of such analyses; and</li> <li>f) The operating conditions as existing at the time of sampling or measurement as provided in 310 CMR 7.00:Appendix C(9)(b) incorporated herein by reference.</li> </ul>
	<p>47) Pursuant to MassDEP authority through 310 CMR 7.00:Appendix C(9)(b)2., monitor facility operations such that VOC are stored and disposed of in a manner which will minimize evaporation to the atmosphere so that compliance with 310 CMR 7.18(17) is maintained.</p>
	<p>48) Pursuant to MassDEP authority through 310 CMR 7.00:Appendix C(9)(b)2., monitor all actions associated with environmental issues and overall emissions changes at the facility including such information such as the results of federal, state, or local environmental inspections; maintenance or corrective actions related to pollution control equipment; and measures taken to lower overall emissions to the environment (air, solvent waste, etc.).</p>
	<p>49) Pursuant to MassDEP authority through 310 CMR 7.00:Appendix C(9)(b)2., monitor progress towards decreasing overall emissions to the environment including alternative technologies or reformulated materials which have been or will be implemented.</p>
	<p>50) Pursuant to MassDEP authority through 310 CMR 7.00:Appendix C(9)(b)2., monitor facility operations such that compliance with the Annual Compliance Report as required by General Condition 10 of this Permit is met.</p>

<b>Table 5</b>	
EU #	RECORD KEEPING REQUIREMENTS
EU1, EU2, EU3	1) Maintain a record of fuel oil and natural gas usage for the boilers on monthly and twelve month rolling period (current month plus the sum of the previous eleven months) so that compliance with the fuel restrictions contained in Section 5.A of this Permit shall be documented. Said records shall also include the sulfur content of the fuel oil used and a calculation of the resulting emissions from said usage as referenced in Approval MBR-94-RES-141, Section F.
	2) Pursuant to the Department's authority through 310 CMR 7.00: Appendix C(10)(b)2., record unit parameters, as necessary, to ensure continuous compliance with particulate emission limits.
	3) In accordance with 310 CMR 7.04(4)(a), maintain results of fuel utilization facility inspection, maintenance, and testing and the date upon which it was performed posted conspicuously on or near the facility.
EU4	4) Maintain a record of the amount of waste consumed on a monthly and twelve month rolling basis as referenced in Approval MBR-94-RES-141, Section F.
	5) Maintain records of hours of operation per day to determine compliance status with Approval MBR-81-INC-010.
	6) Maintain results of emission testing as required by 310 CMR 7.13 Stack Testing Approval issued by the MassDEP to the Permittee on November 4, 1997.
EU5, EU22	7) PCD-1's minimum combustion temperature, measured at the downstream end of the combustion chamber, shall be recorded with temperature monitoring and recording equipment using a digital readout and stored on a computerized flash card or disc as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.1 and 40 CFR 64.9 (CAM). The temperature records shall be maintained on-site for a minimum of five years, and shall be made available to MassDEP personnel upon request.
	8) In accordance with 40 CFR 64.9 (CAM), the chamber temperature shall be monitored with a thermocouple. Accuracy of the thermocouple shall be verified by a second, or redundant, thermocouple probe inserted into the oxidizer chamber with a hand held meter. This validation check shall be conducted at least annually. The acceptance criterion is $\pm 15^{\circ}\text{F}$ . The temperature records shall be maintained on-site for a minimum of five years, and shall be made available to MassDEP personnel upon request.
	9) That all bypass stack usage associated with PCD-1 shall be monitored and recorded with the date, time, and duration of each bypass stack usage. The Permittee shall notify the MassDEP by telephone within one business day of a bypass stack usage indicating the reason for usage and approximate duration of usage as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.2. Within seven days of each emergency bypass stack usage, The Permittee shall provide this office with a written report of the date and time of bypass usage, amount of uncontrolled emissions, extent of usage, reason for usage, steps taken to remediate the situation, and SOP modifications taken to eliminate the cause of the bypass stack usage in the future.

<b>Table 5</b>	
EU #	RECORD KEEPING REQUIREMENTS
EU5, EU22	10) Maintain adequate monthly records to demonstrate that the VOC and HAP emissions do not exceed the emission levels specified in Table 2 of Approval MBR-09-IND-011. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and HAP's for the month as well as the prior 11 months as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.3. The MassDEP approved On-Site Record Keeping Form can be downloaded at <a href="http://www.mass.gov/dep/air/approvals/reshome.htm">http://www.mass.gov/dep/air/approvals/reshome.htm</a> . These records shall be maintained on site for a minimum of five (5) years and shall be made available to MassDEP personnel upon request.
	11) Maintain on site and accessible at or near the subject equipment, at all times, a copy of Approval letter MBR-09-IND-011 and the most current SOMP for all air-emissions-related equipment at the facility as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.4..
	12) Maintain all records or reports required by this Approval on-site for five (5) years as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.5.
EU5 (Uncontrolled)	13) Maintain adequate monthly records to demonstrate that the VOC and HAP emissions do not exceed the emission levels specified in Table 2 of Approval MBR-09-IND-011. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and HAP for the month as well as the prior 11 months as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.6. The MassDEP approved On-Site Record Keeping Form can be downloaded at <a href="http://www.mass.gov/dep/air/approvals/reshome.htm">http://www.mass.gov/dep/air/approvals/reshome.htm</a> . These records shall be maintained on site for a minimum of five (5) years and shall be made available to MassDEP personnel upon request.
EU7	14) Maintain adequate monthly records to demonstrate that there are no VOC or HAP emissions from this process line as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.7.
EU22	15) Maintain adequate monthly records to demonstrate that the VOC and HAP emissions do not exceed the emission levels specified in Table 2 of Approval MBR-09-IND-011. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and HAP's for the month as well as the prior 11 months as referenced in Approval MBR-09-IND-011, Table 4, Record Keeping Requirements No.3. The MassDEP approved On-Site Record Keeping Form can be downloaded at <a href="http://www.mass.gov/dep/air/approvals/reshome.htm">http://www.mass.gov/dep/air/approvals/reshome.htm</a> . These records shall be maintained on site for a minimum of five (5) years and shall be made available to MassDEP personnel upon request.

<b>Table 5</b>	
EU #	RECORD KEEPING REQUIREMENTS
EU5, EU6, EU7	16) Maintain a record of the dates that the Aerosol Filling Room Leak Detection and Repair Program (AFRLDRP) is conducted to verify that it is being conducted at least semiannually as referenced in Approval MBR-92-IND-053, Proviso No. I.8.
	17) Maintain a record of attendance lists of the required semi-annual Gas Room Operator (GRO) Training (formerly known as Hydrocarbon Safety Training) as referenced in Approval MBR-92-IND-053, Proviso No. I. 20.
	18) Maintain a record of gas room safety venting. Specifically, the gas room operator's initials, date, time, reason, location, and approximate amount of VOC that is vented must be documented. Actively used records must be kept by each filling room, and accumulated records must be stored in the RACT Compliance Files for at least five (5) years and made available for DEP and EPA review as referenced in Approval MBR-92-IND-053, Proviso No. I. 10.
EU9	19) In order to document the compliance status of EU9 with respect to the VOC emission limits established in Table 3 of this Permit, maintain records including, but not limited to, the following information: <ul style="list-style-type: none"> <li>a. Number of cans sprayed out on a monthly basis,</li> <li>b. Number of cans sprayed out on a twelve month rolling basis,</li> <li>c. Pounds of VOC emitted on a monthly basis,</li> <li>d. Pounds of VOC emitted on a twelve month rolling basis,</li> </ul> as referenced in Approval MBR-01-IND-020, Special Condition No. 4.
EU11, EU12A, EU12B, EU12C, EU12D, EU12E	20) Result reports from the semi-annual inspection of all components of the Tank Farm and outdoor piping and all repair records as a result of the Tank Farm Leak Detection and Repair program must be maintained in the RACT Compliance Files for at least five (5) years and must be made available for DEP and EPA inspection as referenced in Approval MBR-92-IND-053, Proviso No. I.9.
	21) Maintain a record of Tank Farm operator training as referenced in Approval MBR-92-IND-053, Proviso No. I. 20.
EU12A, EU12B, EU12C, EU12D, EU12E	22) The Tank Farm operator must record information about each tank truck delivery, including the date, propellant type and the operator's initials. These records must be kept in the RACT Compliance Files for at least five (5) years and must be made available for DEP and EPA inspection as referenced in Approval MBR-92-IND-053, Proviso No. I. 13.
EU13, EU14	23) Maintain a record of fuel oil usage for the fire pumps on a monthly and twelve month rolling period (current month plus the sum of the previous eleven months). Said records shall also include the sulfur content of the fuel oil used and a calculation of the resulting emissions from said usage as referenced in Approval MBR-94-RES-141, Section F.
EU15, EU16	24) Maintain a record of the actual hours of operation based on readings from the cumulative timers on the units, including any routine monthly startup testing for the two propane generators as referenced in Approval MBR-94-RES-141, Section F.

<b>Table 5</b>	
EU #	RECORD KEEPING REQUIREMENTS
EU1, EU2, EU3, EU4, EU13, EU14, EU15, EU16	25) Maintain on file fuel purchase receipts for each unit as referenced in Approval MBR-94-RES-141, Section F.
EU17	26) Record the types and quantities of products processed on Line 5 and the resultant VOC emissions shall be calculated on a monthly and rolling 12-month basis. These records shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request as referenced in Approval MBR-07-IND-004, Special Condition No. 3.  25) That a copy of Approval MBR-07-IND-004 shall be affixed adjacent to the subject equipment as referenced in Approval MBR-07-IND-004, Special Condition No. 5.
EU17, EU21	27) Record keeping-a record keeping system shall be established and continued on site as referenced in Approval MBR-08-IND-005 and Approval MBR-07-IND-004, General Condition No. 2. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination. Recordkeeping shall, at a minimum, include:  a) The initiation and completion dates for the proposed construction/reconstruction/alteration.  b) Maintenance. A record of routine maintenance activities including, at a minimum description of the maintenance performed and the date and time the work was completed.  c) Malfunctions. A record of all malfunctions including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed and the facility returned to compliance.  d) Records shall be maintained documenting the air contaminant emission analysis supporting the response to BWP AQ 01-B Section-C.  e) All records shall be kept on site for five (5) years from date of record and shall be made available to the MassDEP upon request.
EU19	28) Pursuant to the MassDEP's authority through 310 CMR 7.00: Appendix C (10)(b)2, maintain a record of VOC emissions from facility-wide date coding operations so that compliance with the VOC emission limits set forth in Table 3 of this Permit shall be demonstrated.
Facility-Wide	29) Pursuant to the MassDEP's authority through 310 CMR 7.00: Appendix C(10)(b)2, maintain a record of facility-wide VOC, HAPs, SO <sub>2</sub> , and NO <sub>x</sub> emissions on a monthly and 12 month rolling period so that compliance with the emission limits in Table 3 of this Permit shall be documented.

<b>Table 5</b>	
EU #	RECORD KEEPING REQUIREMENTS
Facility-Wide	30) Pursuant to the MassDEP’s authority through 310 CMR 7.00: Appendix C(10)(b)2, maintain a record of any exceedance of any limitation/restriction established in Table 3 of this Permit so that compliance with Table 6, Nos. 8 and 9 of this Permit shall be maintained.
	31) Maintain dedicated RACT Compliance Files, in order to determine compliance. All files must display the date of initial filing. All files must be maintained for a period of at least five (5) years after the initial date of filing. The files must be made available to MassDEP and EPA personnel for inspection. The Permittee may modify and/or improve the current record keeping forms without notification, provided that all of the information in the current record keeping forms necessary to determine compliance is still available as referenced in Approval MBR-92-IND-053, Proviso No. I.1.
	32) Pursuant to the MassDEP’s authority through 310 CMR 7.00: Appendix C(10)(b)2, maintain records of estimated annual propellant and ethanol emissions so that compliance with Table 6, No.4 of this Permit shall be maintained.
	33) Copies of any TTV technical feasibility evaluation results for new aerosol packaged product must be maintained in the RACT Compliance Files for at least five (5) years and must be made available for MassDEP and EPA review as referenced in Approval MBR-92-IND-053, Proviso No. I. 3.
	34) A record of the evaluation of stem seal adapters for any new shave cream products (non-gel) must be maintained in the files for a period of at least five (5) years and made available for MassDEP and EPA inspection as referenced in Approval MBR-92-IND-053, Proviso No. I. 12.
	35) Maintain records of alcohol usage in the RACT Compliance Files for at least five (5) years and make them available for MassDEP and EPA inspection as referenced in Approval MBR-92-IND-053, Proviso No. I.15.
	36) The results of the required inspection, maintenance, and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near each fuel utilization facility having an energy input capacity of $\geq 3$ MMBtu/hr, as provided in 310 CMR 7.04(4)(a) incorporated herein by reference. Said records shall be maintained on site for a period of the five (5) most recent years.
	37) Maintain fuel purchase records in order to demonstrate compliance with fuel sulfur content requirements as provided in 310 CMR 7.05(1) incorporated herein by reference. Said records shall be maintained on site for a period of the five (5) most recent years.
38) Maintain records of facility operations such that information may be reported as required for compliance with 310 CMR 7.12. Keep copies of all information supplied to the MassDEP pursuant to 310 CMR 7.12 on site for five (5) years after the date the report is submitted.	

<b>Table 5</b>	
EU #	RECORD KEEPING REQUIREMENTS
Facility-Wide	<p>39) Maintain records of all monitoring data and supporting information on site for a period of at least five (5) years from the date of the monitoring sample, measurement, report or Operating Permit Renewal Application. Supporting information includes at a minimum, all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the operating permit, and any other information required to interpret the monitoring data. Records required to be maintained shall include, where applicable:</p> <ul style="list-style-type: none"> <li>a) The date, place as defined in the Permit, and time of sampling or measurements;</li> <li>b) The date(s) analyses were performed;</li> <li>c) The company or entity that performed the analyses;</li> <li>d) The analytical techniques or methods used;</li> <li>e) The results of such analyses; and</li> <li>f) The operating conditions as existing at the time of sampling or measurement as provided in 310 CMR 7.00:Appendix C(10)(b) incorporated herein by reference.</li> </ul>
	<p>40) Maintain an Environmental Logbook, or equivalent system, which shall record all actions associated with environmental issues and overall emissions changes at the facility. The Permittee shall record information such as the results of federal, state, or local environmental inspections; maintenance or corrective actions related to pollution control/recovery equipment; and measures taken to lower overall emissions to the environment (air, solvent waste, etc.) as referenced in Approval MBR-07-IND-004, Special Condition No. 4; and in Approval MBR-92-IND-053, Proviso No. II.2. This Logbook, or equivalent record keeping system, shall be retained for 5 years and be made available to MassDEP personnel upon request. If records are already kept in separate logbook(s) or in the RACT compliance files, the Environmental Logbook does not have to duplicate the files, but can highlight significant notes from the other record keeping files, or make reference to the other files as referenced in Approval MBR-92-IND-053, Proviso No. II.2.</p>
	<p>41) Pursuant to the MassDEP’s authority through 310 CMR 7.00: Appendix C(10)(b)2, maintain a record of the six month summaries of monitoring data and supporting information so that compliance with the reporting requirement in Table 6, No. 7 shall be maintained.</p>
	<p>42) Pursuant to the MassDEP’s authority through 310 CMR 7.00: Appendix C(10)(b)2, maintain a record of any required stack testing results.</p>
	<p>43) Pursuant to the MassDEP’s authority through 310 CMR 7.00:Appendix C(10)(b)2., maintain facility records such that compliance with the Annual Compliance Report submittal required in Table 6, No. 8 shall be maintained.</p>



<b>Table 5</b>	
EU #	RECORD KEEPING REQUIREMENTS
Facility-Wide	44) All required records shall be maintained on-site for a period of at least five years as provided in 310 CMR 7.00: Appendix C(10)(b) and incorporated herein by reference.

<b>Table 6</b>	
EU #	REPORTING REQUIREMENTS
EU1, EU2, EU3, EU4, EU13, EU14, EU15, EU16	<p>1) The Permittee shall submit an Annual Restricted Emissions Status Compliance Report (ARESCR) which documents the compliance status of the facility, for the previous Calendar Year, with respect to the limitations/restrictions as referenced in Approval MBR-94-RES-141, Section G. This ARESCR shall be submitted as part of the annual filing required by 310 CMR 7.12.</p> <p>2) ) The Permittee shall submit a Restricted Emissions Status Exceedance Report (RESER) to the MassDEP should the facility exceed any limitations/restriction established within Approval MBR-94-RES-141. Said RESER shall be submitted to MassDEP’s Northeast Regional Office within seven (7) days of documentation of the exceedance of the operational limitation by the Permittee personnel. The RESER shall include identification, duration, and reason for the exceedance, and a remedial action plan to prevent future exceedances.</p>
EU4	3) Submit results of emission testing as required by 310 CMR 7.13 Stack Testing Test Approval issued by MassDEP to the Permittee on November 4, 1997.
EU5, EU22	<p>4) That all bypass stack usage associated with PCD-1 shall be monitored and recorded with the date, time, and duration of each bypass stack usage. The Permittee shall notify the MassDEP by telephone within one business day of a bypass stack usage indicating the reason for usage and approximate duration of usage as referenced in Approval MBR-09-IND-011, Table 5, Reporting Requirements No.1. Within seven days of each emergency bypass stack usage, The Permittee shall provide this office with a written report of the date and time of bypass usage, amount of uncontrolled emissions, extent of usage, reason for usage, steps taken to remediate the situation, and SOP modifications taken to eliminate the cause of the bypass stack usage in the future.</p> <p>5) Complete additional emissions testing of PCD-1 and the associated PTEs, at least once every three years or whenever MassDEP otherwise deems such as necessary as referenced in Approval MBR-09-IND-011, Table 5, Reporting Requirements No.2. A final emission compliance test results report shall be submitted to this Office, attention Permit Chief for the Bureau of Waste Prevention, within 60 days after the completion of each required compliance test.</p> <p>6) Submit an annual report to this Office, attention Bureau of Waste Prevention Permit Chief, by January 31 of the following year, summarizing its progress towards decreasing overall emissions to the environment. This report shall discuss alternative technologies or reformulated materials which have been or will be implemented at the subject facility as referenced in Approval MBR-09-IND-011, Table 5, Reporting Requirements No.3.</p>

<b>Table 6</b>	
EU #	REPORTING REQUIREMENTS
EU17, EU21	7) Any construction, substantial reconstruction or alteration, as described in 310 CMR 7.02(1), (3) and (4), at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to the MassDEP on the next required source registration as referenced in Approval MBR-08-IND-005, General Condition No. 3 and Approval MBR-07-IND-004, General Condition No. 6.
	8) The Regional Bureau of Waste Prevention office must be notified by telephone or fax as soon as possible after the occurrence of any upsets or malfunctions to the facility equipment, air pollution control equipment, or monitoring equipment which result in an excess emission to the air and a condition of air pollution as referenced in Approval MBR-08-IND-005, General Condition No. 6 and Approval MBR-07-IND-004, General Condition No. 3.
EU21	9) Opacity, exclusive of uncombined water, shall not exceed 10% at all times during all modes of operation, including startups and shutdowns. Visible emissions or opacity, which exceeds this limit, shall be reported to the MassDEP in writing or by fax within seven (7) days of the occurrence as referenced in Approval MBR-08-IND-005.
Facility-Wide	10) At any time, should the Permittee calculate that its estimated annual propellant and ethanol emissions are greater than 90% of its emissions cap of 150 tons per rolling twelve month period (i.e. 135 tons), the Permittee shall notify MassDEP and EPA of this in writing as referenced in Approval MBR-92-IND-053, Proviso No. I.17.
	11) Submit, in writing, an Exceedance Report to MassDEP should the facility exceed any limitation/restriction established in Table 2 of Approval MBR-09-IND-011. Said Exceedance Report shall be submitted within seven (7) days of determination of the exceedance of the limitation/restriction. The Exceedance Report shall include identification, duration, and reason for the exceedance, and the remedial action plan to prevent future exceedances as referenced in Approval MBR-09-IND-011, Table 5, Reporting Requirements No.4.
	12) Accurately report to MassDEP in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note any minor changes, which did not require Plan Approval (under 310 CMR 7.02, 7.03, etc.) therein as referenced in Approval MBR-09-IND-011, Table 5, Reporting Requirements No.5.
	13) Maintain all records or reports required by this Approval on-site for five (5) years. All records shall be made available to representatives of MassDEP or EPA upon request as referenced in Approval MBR-09-IND-011, Table 5, Reporting Requirements No.6.
	14) Upon MassDEP 's request, any record relative to the Operating Permit or to the emissions of any air contaminant from the facility shall be submitted to MassDEP within 30 days of the request by MassDEP or within a longer time period if approved in writing by MassDEP, and shall be transmitted on paper, on computer disk, or electronically at the discretion of MassDEP, pursuant to 310 CMR 7.00: Appendix C(10)(a) incorporated herein by reference.

<b>Table 6</b>	
EU #	REPORTING REQUIREMENTS
Facility-wide	15) Submit by January 30 and July 30 for the previous six months respectively, a summary of all monitoring data and related supporting information to MassDEP as required by 310 CMR 7.00: Appendix C(10)(c) (Please also see General Condition No. 10 of this Permit).
	16) Submit Annual Compliance Report to MassDEP and USEPA annually by January 30th, as required by General Condition 10 of this Permit.
	17) Promptly report to MassDEP all instances of deviations from Permit requirements (including but not limited to testing for efficient operation, fuel sulfur content emission limitations/standards) by telephone or fax, within three days of discovery of such deviation, as provided in 310 CMR 7.00: Appendix C(10)(f), incorporated herein by reference (Please also see General Condition No. 25 of this Permit).
	18) All required reports must be certified by a responsible official as provided in 310 CMR 7.00: Appendix C(10)(h) incorporated herein by reference.
	19) On an annual basis, register on a form obtained from MassDEP such information as MassDEP may specify including: <ul style="list-style-type: none"> <li>a) the nature and amounts of the emissions from the facility,</li> <li>b) information which may be needed to determine the nature and amounts of emissions from the facility, and</li> <li>c) any other information pertaining to the facility which MassDEP requires as provided in 310 CMR 7.12 incorporated herein by reference.</li> </ul>
	20) Submit to MassDEP the test results reports for any required stack testing as provided in 310 CMR 7.13(1)(d) incorporated herein by reference.

### 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:

<b>Table 7</b>	
REGULATION	DESCRIPTION
310 CMR 7.16	Reduction of Single Occupant Commuter Vehicle Use

## **5. SPECIAL TERMS AND CONDITIONS**

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

### **A. EU1, EU2, EU3:**

- The Permittee shall restrict fuel usage so that the following four equations are satisfied, as referenced in Approval MBR-94-RES-141, Section D and Application MBR-95-OPP-041:

#### MONTHLY FUEL RESTRICTIONS

$$\frac{154 \text{ lb SO}_2 \text{ (x)}}{1000 \text{ gals \#6 and \#4 oil}} + \frac{44 \text{ lb SO}_2 \text{ (y)}}{1000 \text{ gals \#2 oil}} + \frac{0.6 \text{ lb SO}_2 \text{ (z)}}{10^6 \text{ feet}^3 \text{ natural gas}} \leq \frac{32.7 \text{ tons SO}_2}{\text{month}}$$

$$\frac{55 \text{ lb NO}_x \text{ (x)}}{1000 \text{ gals \#6 and \#4 oil}} + \frac{20 \text{ lb NO}_x \text{ (y)}}{1000 \text{ gals \#2 oil}} + \frac{140 \text{ lb NO}_x \text{ (z)}}{10^6 \text{ feet}^3 \text{ natural gas}} \leq \frac{16.5 \text{ tons NO}_x}{\text{month}}$$

where: **x** = total number of gallons of #6 oil and #4 oil with maximum sulfur content of 1.0 percent by weight used in EU1, EU2, and EU3 per month

**y** = number of gallons of #2 oil with maximum sulfur content of 0.3 percent by weight used in EU1, EU2, and EU3 per month

**z** = number of cubic feet of natural gas used in EU1, EU2, and EU3 per month

gals = gallons

lb = pounds

#### TWELVE MONTH ROLLING CALENDAR PERIOD FUEL RESTRICTIONS

$$\frac{154 \text{ lb SO}_2 \text{ (X)}}{1000 \text{ gals \#6 and \#4 oil}} + \frac{44 \text{ lb SO}_2 \text{ (Y)}}{1000 \text{ gals \#2 oil}} + \frac{0.6 \text{ lb SO}_2 \text{ (Z)}}{10^6 \text{ feet}^3 \text{ natural gas}} \leq \frac{96.7 \text{ tons SO}_2}{12 \text{ month rolling period}}$$

$$\frac{55 \text{ lb NO}_x \text{ (X)}}{1000 \text{ gals \#6 and \#4 oil}} + \frac{20 \text{ lb NO}_x \text{ (Y)}}{1000 \text{ gals \#2 oil}} + \frac{140 \text{ lb NO}_x \text{ (Z)}}{10^6 \text{ feet}^3 \text{ natural gas}} \leq \frac{43.3 \text{ tons NO}_x}{12 \text{ month rolling period}}$$

where: **X** = total number of gallons of #6 oil and #4 oil with maximum sulfur content of 1.0 percent by weight used in EU1, EU2, and EU3 per rolling 12 month period

**Y** = number of gallons of #2 oil with maximum sulfur content of 0.3 percent by weight used in EU1, EU2, and EU3 per rolling 12 month period

**Z** = number of cubic feet of natural gas used in EU1, EU2, and EU3 per rolling 12 month period

gals = gallons

lb = pounds

**B. EU4:**

1. Permanently affix the Standard Operating and Maintenance Procedures (SOMP) on or near the unit and operate unit in accordance with said SOMP as referenced in Approval MBR-81-INC-010, Proviso No. 3.
2. The Permittee shall comply with Massachusetts' requirements for commercial and industrial solid waste incineration (CISWI) units developed in accordance with 40 CFR Part 60, Subpart DDDD, "Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units", or in the event Massachusetts does not submit a 'state plan', the requirements of 40 CFR Part 62, Subpart III, the Federal Plan Requirements for Commercial and Industrial Solid Waste Incinerators Constructed on or Before November 30, 1999.

**C. EU5, EU7, EU22:**

1. As referenced in Approval MBR-09-IND-011, Special Condition No. 1, this Approval, No. MBR-09-IND-011, shall supersede in their entirety, Final Approval No. MBR-06-IND-004, issued to you by MassDEP on October 22, 2008, Final Approval No. MBR-96-IND-045, issued to you by MassDEP on May 2, 2001, and Final Approval No. MBR-06-IND-007, issued to you by MassDEP on May 22, 2006. Also, this Approval, No. MBR-09-IND-011 shall supersede those requirements relating to the Line 1 filling process specified in Emission Control Plan Final Approval No. MBR-92-IND-053, which was issued to you by MassDEP on June 17, 1999. All other requirements of Approval No. MBR-07-IND-004 and Approval No. MBR-92-IND-053 shall remain in full force and effect.
2. As referenced in Approval MBR-09-IND-011, Special Condition No. 3, any net VOC emissions increase, facility-wide, occurring over a period of five consecutive calendar years which equates to 25 or more tons of VOC shall become subject to Nonattainment Review, as per the requirements of 310 CMR 7.00: Appendix A. The proposed modifications requested in the plan application MBR-09-IND-011 did not result in a net VOC emissions increase.

3. As referenced in Approval MBR-09-IND-011, Special Condition No. 4, that for compliance testing purposes, the inlet sampling ports (90 degrees apart from each other) on PCD-1 must be located on the inlet stream of the subject air pollution control device. The outlet sampling ports (90 degrees apart from each other) must be located downstream of the air pollution control device and upstream of any dilution or recirculation streams. Each of the inlet and outlet sample ports must be located at a minimum of one duct diameter upstream and two duct diameters downstream of any flow disturbance in accordance with 40 CFR 60, Appendix A, Method 1.
4. As referenced in Approval MBR-09-IND-011, Special Condition No. 5, the Permittee shall maintain documentation near the subject equipment and adhere to the criteria for VOC capture efficiency - U.S. EPA Method 204 requirements for permanent total enclosures (PTE) for Line 1 and 4 Sepro gassing rooms. The criteria for a PTE are the following:
  - a) All access doors, windows and hood latches are closed during normal operation.
  - b) The interior of the PTE is under negative pressure to the outside environment.
  - c) The average velocity through the natural draft openings (NDOs) must be greater than 200 feet per minute.
  - d) Sources of VOC in the PTE must be at least four (4) equivalent diameters from each NDO.
  - e) The total area of all NDOs must be less than five (5) percent of the total area of the enclosure.
5. As referenced in Approval MBR-09-IND-011, Special Condition No. 6, PCD-1 shall provide an overall, minimum control efficiency of 98 weight percent for VOC or a maximum hourly VOC emission rate there from of 0.40 pounds per hour, whichever is least stringent. The associated permanent total enclosures (PTEs) shall provide 100 percent capture efficiency of the VOC emissions from Line 3 and 100 percent capture efficiency from Line 1 while shave gels are being manufactured. The system's actual VOC capture efficiency and VOC destruction efficiency shall be

demonstrated through compliance testing as specified in Table 4, Monitoring/Testing Requirements, No. 10 above.

6. As referenced in Approval MBR-09-IND-011, Special Condition No. 7, the existing PCD-1 shall utilize natural gas as its only fuel.
7. As referenced in Approval MBR-09-IND-011, Special Condition No. 9, PCD-1's start-up specifications and maintenance procedures shall be incorporated into the SOMP. The SOMP shall address the gassing room emergency venting procedures, spare parts inventory, and back-up equipment systems for the gassing room equipment and PCD-1 to prevent or reduce its downtime. In addition, a copy of any subsequent revisions made to the SOMP must be submitted to this office within seven (7) days of the modification(s).
8. That an electronic interlock system shall prevent the equipment in the associated gassing rooms from operating until PCD-1 achieves a combustion chamber outlet oxidizer temperature of 1400 degrees F. The electronic interlock system shall prevent the equipment in the gassing rooms from operating if the PCD-1's outlet temperature falls below 1400 degrees F for any reason as referenced in Approval MBR-09-IND-011, Special Condition No. 10 and the CAM plan.
9. If any PCD-1 upset occurs and lasts for more than fifteen (15) minutes which prevents the Permittee from operating the PCD-1 and PTE properly (i.e. a 98 percent by weight VOC destruction efficiency and a 100 percent by weight VOC capture efficiency for the Sepro gassing rooms), then the Permittee shall discontinue operation of the equipment in the gassing rooms until PCD-1 and/or PTE is repaired and operating properly, as referenced in Approval MBR-09-IND-011, Special Condition No. 11 and the CAM plan.
10. The Permittee shall maintain operating and preventative maintenance logs on-site to document the proper operation and maintenance conducted on the subject air pollution control device in accordance with its SOMP, as referenced in 40 CFR 64.9 (CAM).
11. As referenced in Approval MBR-09-IND-011, Special Condition No. 12, there are two (2) PCD-1 upset conditions for which the associated operations of the shave cream production in Line 1 or everything else in Line 3 shall immediately be shut down. The two conditions are as follows:

- a. if its combustion chamber temperature exceeds 1,800 °F; and/or
  - b. if its PCD-1 exhaust fan fails.
12. As referenced in Approval MBR-09-IND-011, Special Condition No. 13, all VOC/HAPs containing materials, such as solvents and clean-up solutions, shall be transported and stored in tightly covered containers.
13. As referenced in Approval MBR-09-IND-011, Special Condition No. 14, all cleaning rags used in conjunction with the cleaning solutions shall be placed in tightly covered containers when not in use, and shall be collected for proper recycling or disposal.
14. As referenced in Approval MBR-09-IND-011, Special Condition No. 15, the Permittee shall maintain operating and preventative maintenance logs on-site to document the proper operation and maintenance conducted on PCD-1 in accordance with its SOMP.
15. As referenced in Approval MBR-09-IND-011, Special Condition No. 16, that any stack exit rain protection device shall not impede the exhaust gas flow from the PCD-1 exhaust stack.
16. As referenced in Approval MBR-09-IND-011, Special Condition No. 17, should PCD-1 become inoperable, for any reason, the Permittee shall notify MassDEP one business day by fax, attention Bureau of Waste Prevention Compliance & Enforcement Chief, at (978) 694-3499 and subsequently in writing within seven (7) days of occurrence describing the reason(s) for and the extent of down time of the equipment and all steps that have been or will be taken to prevent said occurrence from recurring. The Permittee shall take immediate action to minimize emissions and diagnose and repair the problem.
17. As referenced in Approval MBR-09-IND-011, General Condition No. 3, the Permittee shall continue to investigate the feasibility of implementing alternative technologies or reformulated raw material inputs which will lead to the decrease of overall emissions from the subject facility to the environment (air emissions, solvent waste, etc.). The subject facility shall seek assistance from outside sources such as suppliers, vendors, or the Office of Technical Assistance (which is located at the Executive Office of Environmental Affairs, 251 Causeway Street, Suite 900, Boston, Massachusetts, 02114, Telephone No. 617-626-1060). The Permittee personnel shall record any information supplied to them relative to reducing overall



emissions and pollution prevention techniques. This information as well as any progress towards decreasing overall emissions to the environment shall be recorded in an Environmental Logbook, or equivalent record keeping system (See Approval MBR-09-IND-011, General Condition No. 4 below).

18. As referenced in Approval MBR-09-IND-011, General Condition No. 4, the Permittee shall maintain an Environmental Logbook, or equivalent record keeping system, which shall document all actions associated with environmental issues and overall emissions changes at the facility. The facility shall record information such as the results of federal, state, or local environmental inspections; maintenance or corrective actions related to pollution control equipment; and measures taken to lower overall emissions to the environment (air, solvent waste, etc.). This Logbook, or equivalent record keeping system, shall be retained for 5 years and be made available to MassDEP personnel upon request.
19. As referenced in Approval MBR-09-IND-011, General Condition No. 5, the Permittee shall allow MassDEP personnel access to the plant site, buildings, and all pertinent records during business hours for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

**D. EU5, EU6, EU7:**

1. The Permittee must continue use of its Reduced Pump Pressure Program. Under this program the Permittee must post next to each filling line the optimal matrix of pump pressures as a function of can size and fill speed (which itself is a function of numerous variables, such as aerosol valve configuration). The Permittee must update its matrices as necessary. Copies of all matrices, including outdated matrices, must be included in the RACT Compliance Files for at least five (5) years and must be available for MassDEP and EPA review. MassDEP and EPA may review the matrices as posted next to the gassing rooms, as well. The Permittee's Changeover Procedures shall be revised to require use of the matrix. This SOP for Changeover Procedures must also be available for the MassDEP and EPA review as referenced in Approval MBR-92-IND-053, Proviso No. I. 7.
2. The Permittee must continue its present gas room safety venting practice of venting only for reasons of maintenance, emergencies and/or long-term shutdowns (i.e., anticipated 7 days out of use) as referenced in Approval MBR-92-IND-053, Proviso No. I.10.

3. The Permittee shall reclaim the production line waste cans on a daily basis (to prevent leaking cans from adding additional VOC into the atmosphere) provided that the Resource Recovery Facility is operating in compliance with the requirements specified in this Permit or in other applicable federal or state regulations and is not down for maintenance as referenced in Approval MBR-92-IND-053, Proviso No. I.16.
4. The Permittee must conduct semi-annual Gas Room Operator (GRO) Training (formerly known as Hydrocarbon Safety Training) for gas room mechanics, as referenced in Approval MBR-92-IND-053, Proviso I.20.
5. The Permittee must continue to use the seal-less booster pumps as referenced in Approval MBR-92-IND-053, Proviso No. I.6 and Application No. MBR-95-OPP-041.

**E. EU8:**

1. The Permittee must continue its maintenance practices for the Liquid Mix Room tanks containing alcohol-based products to ensure that the hatch seals are in place and intact. The Permittee must keep the tank hatches closed whenever possible as referenced in Approval MBR-92-IND-053, Proviso No. I.14.

**F. EU11, EU12A, EU12B, EU12C, EU12D, EU12E:**

1. Tank truck hatches and rail car hatches in the Tank Farm must be closed at all times except during loading or unloading as referenced in Approval MBR-92-IND-053, Proviso No. I.14.
2. Continue to use the comprehensive Tank Farm Leak Detection and Repair Program (TFLDRP) which includes both propellant and ethanol fugitive emission sources. All components of the Tank Farm and outdoor piping must be inspected semi-annually, as referenced in Approval MBR-92-IND-053, Proviso No. I.9.
3. Train new Tank Farm operators using the Propellant and Ethanol Tank Farm Emission Minimization Program within the first week of a new Tank Farm operator's hiring/transfer, whenever a new person is assigned to the Tank Farm for a period of longer than one month as referenced in Approval MBR-92-IND-053, Proviso I.20.

**G. EU17, EU21**

1. Operation - No person shall operate a facility constructed, substantially reconstructed, or altered pursuant to 310 CMR 7.02(1), (3) and (4) except in conformance with the requirements established therein and in conformance with the specific written plan approval requirements as referenced in Approval MBR-08-IND-005 and Approval MBR-07-IND-004, General Condition No. 1.
2. Noise from the facility during routine operation, including startups and shutdowns, shall not exceed the MassDEP noise guidelines and shall not cause a condition of air pollution as defined in 310 CMR 7.01 and 7.10(State requirement only) as referenced in Approval MBR-08-IND-005, General Condition No. 5 and Approval MBR-07-IND-004, General Condition No. 8.
3. The Approval may be suspended, modified, or revoked by the MassDEP if, at any time, the MassDEP determines that the facility is violating any condition or part of the LPA Approval. The MassDEP shall be notified in writing prior to any modification of the facility such as a change in raw materials or an increase in production capacity, which may increase emissions ) as referenced in Approval MBR-08-IND-005, General Condition No. 9 and Approval MBR-07-IND-004, General Condition No. 7.
4. Should asbestos remediation/removal be required as a result of the approved construction/reconstruction/or alteration of this facility, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15 in its entirety and 310 CMR 4.00 as referenced in Approval MBR-08-IND-005, General Condition No. 10 and Approval MBR-07-IND-004, General Condition No. 11.

**H. EU21**

1. The facility shall be constructed and operated in strict accordance with the application approved herein. Should there be any differences between the aforementioned application and this approval letter, this approval letter shall govern as referenced in Approval MBR-08-IND-005, General Condition No. 14.

**I. FACILITY-WIDE:**

1. Should any nuisance condition be generated at the facility, then appropriate steps shall immediately be taken to abate said nuisance

condition(s). (State only requirement - 310 CMR 7.01 General Regulations to Prevent Air Pollution)

2. All reciprocating internal combustion engines shall continue to be equipped and operated with exhaust silencers so that sound emissions from the engines do not cause or contribute to a condition of air pollution. (State only requirement - 310 CMR 7.10 Noise)
3. The Permittee shall not permit any dust or odor operations to cause or contribute to a condition of air pollution. (State only requirement - 310 CMR 7.09 Dust, Odor, Construction, and Demolition)
4. The Permittee must continue to use stem seal adapters for all of its current shave cream (non-gel) products. For any new shave cream (non-gel) products, stem seal adapters must be evaluated for technical feasibility, and used if technically feasible as referenced in Approval MBR-92-IND-053, Proviso No. I.12.
5. The Permittee must minimize the use of ethanol for non-production use (labs & parts cleaning) and must continue to track its alcohol usage on a monthly basis. These records will be kept in the RACT Compliance Files for at least five (5) years and be made available for MassDEP and EPA inspection as referenced in Approval MBR-92-IND-053, Proviso No. I.15.
6. The Permittee shall continue to utilize pollution prevention techniques, such as TTV filling, whenever feasible to minimize VOC losses as referenced in Approval MBR-92-IND-053, Proviso No. I.3.
7. At any time, should the Permittee calculate that its estimated annual propellant and ethanol emissions are greater than 90% of its emissions cap of 150 tons per rolling twelve month period (i.e. 135 tons), the Permittee shall modify its production schedule to prevent an exceedance of its VOC cap, as referenced in Approval MBR-92-IND-053, Proviso No. I.17.
8. As referenced in Approval MBR-92-IND-053, Proviso No. I.18, should a new type of propellant be chosen or a concentrate solvent substitute for ethanol be chosen other than those listed below, the Permittee must evaluate the effects of the change and notify the MassDEP and EPA in writing of the substitution, the effect on emissions and other effects of the proposed change prior to making the change. The Permittee shall maintain records on these reformulations changes that require MassDEP and EPA

notification, and shall keep the records in its RACT Compliance Files for at least five (5) years. Propellants and concentrates considered acceptable to substitute or use without notification include:

Acceptable materials for normal production of aerosol-packaged products:

Acceptable propellants (HVOCs):

- a. propane
- b. normal butane
- c. pentane
- d. isopentane (as a propellant; isopentane is now used as a "blowing agent")
- e. dimethyl ether
- f. propellant HFC-152A
- g. combinations of any of the above propellants

Acceptable solvents (MVOCs):

- a. any type of ethanol for production

Acceptable material for normal production and ancillary operation:

The Permittee may use the following materials without prior MassDEP and EPA approval provided that facility continues to use pollution prevention techniques to minimize emissions, and maintains emission records:

- a. any solvents or materials in the laboratories;
- b. any cleaning solvents associated with ancillary operations;
- c. any MVOC or LVOC for any other purpose.

9. The Permittee is subject to 310 CMR 7.18(17) and therefore must also comply with 310 CMR 7.18(1)(c) which requires that VOCs be stored and disposed of "in a manner which will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover. Proper disposal shall include incineration in an incinerator approved by the Department, transfer to another person licensed by the Department to handle VOC, or any other equivalent method approved by the Department."

10. Any net VOC emissions increase, facility-wide, occurring over a period of five consecutive calendar years which equates to 25 or more tons of VOC shall become subject to Nonattainment Review, as per the requirements of 310 CMR 7.00: Appendix A.
11. The Permittee has indicated that this facility is subject to the requirements of 42 U.S.C. 7401, §112(r) Accidental Release Prevention Requirements: Risk Management under Clean Air Act 112(r)(7), and has submitted to the "regulating authority" the facility's contingency plan for responding to accidental releases of regulated substances.
12. The Permittee is subject to, and has stated in their Operating Permit Application, Transmittal Number 108078, that they are 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.
13. The Permittee is subject to, and has stated in their Operating Permit Application, Transmittal Number 108078, that they are in compliance with the requirements of 40 CFR Part 59, Subpart C. These requirements are applicable to this facility and the United States Environmental Protection Agency enforces these requirements.
14. The Permittee has indicated that this facility is subject to, and complying with, the requirements of 310 CMR 7.25, Best Available Controls for Consumer and Commercial Products.

## **6. ALTERNATIVE OPERATING SCENARIOS**

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

## **7. EMISSIONS TRADING**

- (a) Intra-facility emission trading

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

- (b) Inter-facility emission trading

The Permittee did not request inter-facility emissions trading in its Operating Permit Renewal 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 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 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:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
- iv. 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:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;
- iv. whether there were any deviations during the reporting period;
- v. if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
- vi. whether deviations in the reporting period were previously reported;
- vii. if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
- viii. if the deviations in the reporting period have returned to compliance and date of such return to compliance; and
- ix. 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 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:
- (i) the liability of the source for any violation of applicable requirements prior to or at the time of permit issuance.
  - (ii) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
  - (iii) 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 five (5) years after the 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 that 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 proposed 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, 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 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 based<sup>1</sup> emission limitations specified in this permit as a result of an emergency<sup>2</sup>. 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 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.

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<sup>1</sup> 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.

<sup>2</sup> An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, 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.

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 or fax, within three (3) days of discovery of such deviation:

- 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.
- 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.
- Exceedances of permit operational limitations directly correlated to excess emissions.
- 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.
- 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 or fax 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.

## **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.