

# Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Charles D. Baker Governor

Karyn E. Polito Lieutenant Governor Bethany A. Card Secretary

Martin Suuberg Commissioner

Mr. Alex Norkivicious Production Manager Callaway Golf Ball, Inc. 425 Meadow Street Chicopee, MA 01020

Re: 310 CMR 7.00 – APPENDIX C Callaway Golf Ball, Inc. - Chicopee, MA Application Number: BWP AQ 12 Transmittal Number: X276858 MassDEP Approval Number: WE-17-022

### **OPERATING PERMIT RENEWAL**

Dear Mr. Norkiviciuos:

In accordance with 310 CMR 7.00—APPENDIX C(6) of the Air Pollution Control Regulations ("the Regulations"), the Department of Environmental Protection ("Department") is forwarding to EPA the attached Operating Permit Renewal for Callaway Golf Ball, Inc. located at 425 Meadow Street in Chicopee, MA.

A copy of the Draft Renewal Operating Permit was posted on the Massachusetts Energy and Environmental (EEA) Public Access System "EEA ePLACE Public Access Portal" website on December 21, 2021 in accordance with the requirements of 310 CMR 7.00 Appendix C. As such, the public comment period ended on January 20, 2022. During that period, no comments were received. No public hearing was requested pursuant to 310 CMR 7.00: Appendix C(6)(f).

EPA reviewed of your "Proposed Operating Permit Renewal". Previously, EPA provided MassDEP with comments on other Operating Permits stating that Section 29, be removed from all Operating Permits.

In addition, the State Implementation Plan agreement with EPA has also changed requiring that the regulations 310 CMR 7.09 (Odor) and 310 CMR 10 (Noise) found in Paragraph 13, likewise be removed from all Operating Permits.

This information is available in alternate format. Contact Glynnis Bugg at 617-348-4040. TTY# MassRelay Service 1-800-439-2370 MassDEP Website: www.mass.gov/dep Callaway Golf Ball, Inc. Operating Permit Renewal Application Number: BWP-AQ -12 Transmittal Number: X276858 MassDEP Approval Number: WE-17-022 Page 2 of 2

As such your Operating Permit has been updated from the draft and proposed OP's you previously reviewed, in that regulations 310 CMR 7.09 and 310 CMR 7.10 in Paragraph 13 and all of Section 29 have been removed from your Operating Permit Renewal.

The attached Operating Permit Renewal contains all of the federal and state air pollution control requirements, to which the facility is subject, and the terms and conditions for compliance with such applicable requirements.

If you have any questions concerning this Operating Permit Renewal, please contact Bob Shultz of the Western Regional Office at <u>Robert.Shultz@mass.gov</u> or at the address provided in the letterhead.

Sincerely,

Man hi

Date: November, 17 2022

Marc Simpson Air Quality Permit Chief Western Regional Office

ecc: Patrick Bird, Undine Kipka - USEPA Region 1 M. Simpson, D. Hall, D. Balboni, A. Piubeni - MassDEP WERO Yi Tian - MassDEP, Boston Matt.Palladino@callawaygolf.com



# Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Charles D. Baker Governor

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## **RENEWED AIR QUALITY OPERATING PERMIT**

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

#### **ISSUED TO ["the Permittee"]:**

Callaway Golf Ball Operations, Inc. 425 Meadow Street, P.O. Box 901 Chicopee, MA 01021-0901

#### FACILITY LOCATION:

Callaway Golf Ball Operations, Inc. 425 Meadow Street, P.O. Box 901 Chicopee, MA 01021-0901

## NATURE OF BUSINESS:

Manufacturer of golf balls

#### **RESPONSIBLE OFFICIAL:**

Name: Algis Norkevicius Title: Production Manager

#### **INFORMATION RELIED UPON:**

Application No. BWP-AQ-12 Transmittal No. X276858 MassDEP Approval Number: WE-17-022

#### FACILITY IDENTIFYING NUMBERS:

AQ ID: 0420014 FMF FAC NO.: 387738 FMF RO NO 387740

Standard Industrial Classification (SIC): 3949

North American Industrial Classification System (NAICS): 339920

#### FACILITY CONTACT PERSON:

Name: Matt Palladino Title: Environmental Health, Safety Engineer Phone: 413-322-2640 E-Mail: Matt.Palladino@callawaygolf.com

**This Operating Permit shall expire on:** <u>November 17, 2027</u> For the Department of Environmental Protection

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Michael Gorski Regional Director Department of Environmental Protection Western Regional Office November 17, 2022 Date

This information is available in alternate format. Contact Glynnis Bugg at 617-348-4040. TTY# MassRelay Service 1-800-439-2370 MassDEP Website: www.mass.gov/dep

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RENEWED OPERATING PERMIT Callaway Golf Ball Operations, Inc. Air Quality Operating Permit Transmittal Number: X276858 MassDEP Approval Number: WE-17-022 Page 2 of 36

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# SPECIAL CONDITIONS FOR OPERATING PERMIT

### 1. <u>PERMITTED ACTIVITIES</u>

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

### A. <u>DESCRIPTION OF FACILITY AND OPERATIONS</u>

Callaway Golf Ball Operations, Inc. ("Permittee") is a golf ball manufacturing facility located at 425 Meadow Street in Chicopee, Massachusetts. Since the issuance of the previous Operating Permit #1-O-09-012 (dated May 16, 2013), there have been changes to the air contaminant sources at the facility. The following list contains the air contaminant sources that have changed at the facility.

- Emission Unit -14 (EU-14) Stealth Industries groundwater treatment and contaminated soil venting system equipped with two catalytic oxidizers has been shut down in accordance with RTN-047 and the RCRA 2020 program. This shutdown is referenced under Transmittal Number X227811 approved on May 16, 2016, by the MassDEP's Bureau of Waste Site cleanup ("BWSC").
- Concurrent with the aforementioned Transmittal Number X227811 and also effective May 16, 2016, Emission Unit-22 (EU-22), an Onan generator set, has been shut down and the fuel source removed. EU-22 consisted of an Onan seven-point five-kilowatt (7.5kW) generator powered by a reciprocating internal combustion engine ("RICE").
- On June 20, 2016, a modification of Emission Unit 19 (EU-19) was requested and issued by MassDEP to replace the Pollution Control Device ("PCD") for dust control to a Donaldson Oval Model DFO 4-32, with thirty-two (32) filters configured in four (4) rows wide with eight (8) filters per row.
- The number of paint machines has increased from four (4) to seven (7) and are all identified as Emission Unit #5. The paint machines were consolidated into one emission unit since each paint machine has identical capabilities and identical regulatory requirements.
- One new printer/stamper has been purchased and installed. Likewise, it is identical in all respects to the existing printer/stamping machines. This brings the total number to eighteen printer/stamping machines. These are also identified as part of Emission Unit #5 (EU-5).
- A second golf ball core fabrication line had been permitted. This line produces seventy percent (70%) less per batch than the existing line. This new line is designated Emission Unit # 24 (EU-24). The particulate matter (PM-10) will be controlled by a Donaldson Oval Model DFO 4-16 air filtration unit with sixteen (16) filters.

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The following list contains three air quality plan approvals that have been issued by MassDEP to the Permittee since the issuance of the last operating permit on May 16, 2013. These changes are being implemented at the facility on an ongoing basis and the applicable requirements from each of these air quality plan approvals have been incorporated into the facility's operating permit.

- Non-Major Comprehensive Plan Approval ("nMCPA") #WE-17-013, issued February 28, 2018, for the reactivation of the golf ball surface coaters (paint spray booths) and one new ink printer stamper, incorporating them into the existing emission unit EU-5. These spray booths had been previously approved, and reactivation did not require the facility to obtain a new plan approval prior to recommencing operation. However, the increase in production resulted in an increase in VOC emissions, which mandated the application. In order to meet increasing production demands this nMCPA increased the VOC emissions due to painting and finishing operation from thirty-nine tons per year (39 tpy) to forty-eight tons per year (48 tpy).
- The increase in production also required increased use of VOC-containing materials for clean-up and maintenance. VOC emissions from this activity increased from ten tons per year (10 tpy) to eleven tons per year (11 tpy).
- The aggregate annual VOC emissions amount to fifty-nine tons per year (59 tpy) after this production increase. Emissions were partially offset by a decrease in the VOC content of the coatings. The decrease is tracked in pounds of VOC per dozen finished golf balls, as averaged on a calendar month basis. Permittee will continue to reduce VOC content of the coatings as production increases.
- In addition, WE-17-013 included a hazardous air pollutant (HAP) emission limit of zero point zero two six (0.026) pounds of HAP per pound of coating solids as applied.
- Non-Major Comprehensive Plan Approval ("nMCPA") #WE-17-013, issued February 28, 2018, references that several ink stamper printers are included in Emission Unit Five (EU-5) along with the paint. These printer stampers use an ink dried by exposure to ultraviolet ("UV") light. The HAP content of the ink is limited to 0.026 pounds per pound of coating solids. The facility notifies MassDEP in writing prior to installing new printer stampers but modification of any permit is not required so long as the increase in emissions is demonstrated to be de-minimus.
- Overall HAP emissions remained unchanged at two tons per month (2 tpm) and ten tons per year (10 tpy).
- Acetone emissions remained unchanged at sixty-five tons per year (65 tpy).
- Limited Plan Approval ("LPA") #WE-18-007 was issued June 18, 2018, for the addition of a new golf ball core manufacturing line. This new line is referred to as emission unit twenty-four (EU-24). EU-24 has operational and production limits of 355 days per year, 140 batches per day and forty (40) pounds of raw materials per batch. Particulate emissions from EU-24 are collected and controlled by a Donaldson Oval Cartridge Filter 'Downflo' Model 4-16 pollution control device ("PCD"). This PCD is effective to 99.99% of particulate matter greater than zero point five microns (0.5μ) in size. This PCD is considered to be Top Case Best Available Control Technology ("BACT") for airborne dust control.

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Limited Plan Approval ("LPA") WE-19-010 was issued on May 29, 2019, for the addition of a 110-liter golf ball core manufacturing line. This new line is referred to as emission unit twenty-five (EU-25). EU-25 has operational and production limits of 355 days per year, 225 batches per day and 180 pounds of raw material per batch. Particulate emissions from EU-25 are collected and controlled by a Donaldson Oval Cartridge Filter 'Downflo' Model DFO 4-16 pollution control device ("PCD"). This PCD is effective to 99.99% of particulate matter greater than zero point five microns (0.05μ) in size. This PCD is considered to be Top Case BACT for airborne dust control.

Based on the above changes, the facility currently consists of the following sources: seven (7) golf ball painting machines, three (3) golf ball core mixing/compounding process, four (4) cold cleaning degreasers (three (3) immersion type and one (1) remote reservoir type), and one (1) aqueous cleaner and several printer stamper units. The facility also has a propane-fired 10 horsepower emergency stationary reciprocating internal combustion engine (RICE) and a 4.2 MMBtu/hr. natural gas-fired Cleaver Brooks Model: CB 700-100 boiler. The RICE and 4.2 MMBtu/hr. boiler are both exempt from the plan approval requirements of 310 CMR 7.02. However, the RICE and the 4.2 MMBtu/hr. boiler have applicable regulatory requirements, so they have been incorporated into the operating permit.

The paint machines are subject to the federal National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP, since they are an existing affected source that uses 100 gallons per year, or more, of coatings that contain HAPs in the surface coating of plastic parts and products which are part of a major source of HAP emissions. According to Subpart PPPP, the compliance date for an existing affected source was April 19, 2007.

The affected source includes the following areas that are used for surface coating of plastic parts and products:

- All coating operations as defined in § 63.4581;
- All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
- All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

The applicable requirements of 40 CFR Part 63, Subpart PPPP have been included in this operating permit.

On December 20, 2012, the United States Environmental Protection Agency (USEPA) issued final changes to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDD (Boiler MACT). The 10.2 MMBtu/hr. natural gas-fired boiler is considered to be a new affected source since the Boiler MACT defines a new boiler as one which commenced construction after June 4, 2010. According to the Boiler MACT, the compliance date for new affected sources is no later than the date of publication in the Federal Register or upon startup, whichever is later. Since the facility was a major source of HAPs at the time the 10.2 MMBtu/hr. boiler commenced operation, the boiler is subject to 40 CFR Part 63 Subpart DDDDD. The applicable requirements have been included in this operating permit.

The 10.2 MMBtu/hr. natural gas-fired boiler is also subject to the federal Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60 Subpart Dc, since construction was commenced after June 9, 1989, and the boiler has a maximum design heat input capacity greater than 10 MMBtu/hour but less than 100 MMBtu/hr. The applicable requirements have been included in this operating permit.

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According to 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, the propane-fired 10 horsepower emergency stationary RICE is considered an existing spark ignition engine since it was installed before June 12, 2006 (installed in 1999). The facility's HAP emissions were limited to below major source thresholds prior to the date (October 19, 2013) of the first substantive requirement in 40 CFR Part 63, Subpart ZZZZ. Therefore, the existing spark ignition engine is located at an area source of HAP and is subject to the area source requirements specified in 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

None of the emission units at the facility are subject to the compliance assurance monitoring requirements of 40 CFR Part 64 since there are no emission units which use a control device to achieve compliance with any emission limitation or standard for which the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

The facility has returned to major stationary source status pursuant to the Emission Offsets and Nonattainment Review regulations of 310 CMR 7.00: Appendix A. In accordance with Plan Approval #WE-17-013, issued February 28, 2018, the facility raised the overall potential to emit VOCs to fifty-nine tons per rolling (any 12 consecutive month period) year (59 tpy).

The facility is no longer considered a major source of HAPs since a written request was received on December 5, 2012, to formally restrict the facility's HAP emissions to less than 10 tons per year of any individual HAP and less than 25 tons per year of any combination of HAPs. This limit was confirmed in the operational limits of Non-Major Plan Application WE-17-013, issued on February 28, 2018.

However, the facility is still subject to the Operating Permit and Compliance Program pursuant to 310 CMR 7.00: Appendix C(2).

Massachusetts promulgated the 310 CMR 7.71: Reporting of Greenhouse Gas Emissions regulations on June 26, 2009. Pursuant to 310 CMR 7.71(3)(a)1., the facility is subject to the applicable requirements of this regulation which have been included in this operating permit.

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### 2. <u>EMISSION UNIT IDENTIFICATION</u>

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

	Table 1		
Emission Unit (EU#)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
5	Seven (7) Golf Ball Paint Machines Model No. CNPB-3-7 including: All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation. All stamping/printing machines and associated inks and clean-up solvents	N/A	water curtain
12	Three Immersion Cold Cleaning Degreasers	N/A	none
15	Golf Ball Surface Treatment	N/A	none
17	Cleaver Brooks Model CBI #700-250-150, Natural Gas-Fired Boiler	250 horsepower  10.2 MMBtu/hr.	Flue Gas Recirculation and Low NOx Burners
	Rubber Mixing/Compounding Process containing: hand mixing area, 75-liter kneader, Barwell mill, extruder, two dusters and two work-tables.	125 batches per day/ 60 pounds per batch	Donaldson Oval Dust Collector, DOWNFLO Model: DFO 4-32
20	Remote Reservoir Cold Cleaning Degreaser	N/A	none
21	Aqueous Degreaser	N/A	none
23	Cleaver Brooks Model: CB 700-100 Boiler	4.2 MMBtu/hr.	none
24	Specialty Rubber Mixing/Compounding Process containing: hand mixing area, 21-liter kneader, 1 batch-off, 1 mixing table and 6 work-tables.	140 batches per day/ 40 pounds per batch	Donaldson Oval Dust Collector, DOWNFLO Model: DFO 4-16
25	Specialty Rubber Mixing/Compounding Process containing: 110-liter unitized mill/mixer/kneader, 1 batch-off and 1 work-table.	225 batches per day/ 180 pounds per batch	Donaldson Oval Dust Collector, DOWNFLO Model: DFO 4-16

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

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

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

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### 4. <u>APPLICABLE REQUIREMENTS</u>

### A. <u>OPERATIONAL AND/OR PRODUCTION EMISSION LIMITS AND RESTRICTIONS</u>

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

	Table 3					
Emission Unit Number	Fuel/Raw Material	Pollutant	Operational/ Production Limits	Emissions Limits/Standards <sup>6</sup>	Applicable Regulation and/or Approval No	
	5 Paint and Cleanup Solvent <sup>1</sup>	VOC	None	$ \leq 0.016 \text{ pounds of VOC per dozen finished golf balls}  (averaged on a calendar month basis)   \leq 6 \text{ tons per calendar month}  \leq 48 \text{ tons per year}^2 $	nMCPA WE-17-013	
5		1	nup	None		
		НАР	None	$\leq$ 0.26 pounds per pound of coating solids <sup>(4)</sup>	nMCPA WE-17-013 -and- 40 CFR 63.4490(b)(3) and 63.4491(b)	

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	Table 3 (continued)					
Emission Unit Number	Fuel/Raw Material	Pollutant	Operational/ Production Limits	Emissions Limits/Standards <sup>6</sup>	Applicable Regulation and/or Approval No	
12	Degreasing Solvent <sup>1</sup>	VOC	Each degreaser shall use less than 100 gallons of solvent per calendar month	None	Regulation 310 CMR 7.18(8)(a) Regulation 310 CMR 7.18(1) Regulation 310 CMR 7.03(8)	
15	Acetone	Acetone	None	$\leq 10 \text{ ton/month}$ $\leq 65 \text{ tons per year}^2$	Approval #1-P-11-007	
		NOx		$\leq 0.0350 \text{ lb./MMBtu}$ $\leq 1.6 \text{ tons per year}^2$		
17		Gas Only VOC None		$\leq 0.080$ lb./MMBtu $\leq 3.6$ tons per year <sup>2</sup>		
17	Natural Gas Only		$\leq 0.030$ lb./MMBtu $\leq 1.3$ tons per year <sup>2</sup>	Approval #1-P-11-011		
		PM	ivone	$\leq 0.010 \text{ lb./MMBtu}$ $\leq 0.4 \text{ tons per year}^2$		
		Opacity		$\leq 10\%$ at any time		
		Smoke		No. 1 of "the Chart" no more than 6 minutes during any one hour, no time to exceed No. 2 of "the Chart"	Regulation 310 CMR 7.06(1)(a)	
		РМ		$\leq 1 \text{ ton per year}^2$		
19	Zinc compound	1 IVI	None	$\leq 1 \text{ ton per year}^2$	Approval #1-P-11-003	
powders		owders Onacity		No Visible Emissions at any time (other than water vapor or steam)		

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	Table 3 (continued)				
EU#	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards <sup>6</sup>	Applicable Regulation and/or Approval No
20	Degreasing Solvent <sup>1</sup>	VOC	Each degreaser shall use less than 100 gallons of solvent per calendar month	None	Regulation 310 CMR 7.18(8)(a) Regulation 310 CMR 7.18(1) Regulation 310 CMR 7.03(8)
21	Aqueous Cleaner	VOC	Each degreaser shall use less than 100 gallons of solvent per calendar month	None	Regulation 310 CMR 7.18(8)(d) Regulation 310 CMR 7.18(1) Regulation 310 CMR 7.03(8)
		Particulate Matter	None	The natural gas-fired unit shall not exceed 0.10 lb./MMBtu	Regulation 310 CMR 7.02(8)(h)
23	Natural Gas	Smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	$\leq$ 20%, except 20 to $\leq$ 40% for $\leq$ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
24	Zinc compound powders	РМ	<ul> <li>355 days per year/8520 hours per year</li> <li>and</li> <li>40 pounds per batch/140 batched per day</li> </ul>	<u>&lt;</u> 1.0 tons per year	Approval: WE-18-007
	powders	Opacity	none	Zero opacity	
25	Zinc compound powders	РМ	355 days per year/8520 hours per year and 180 pounds per batch/225 batches per year	$\leq$ 1.0 tons per year	Approval: WE-19-010
		Opacity	none	Zero opacity	

#### RENEWED OPERATING PERMIT Callaway Golf Ball Operations, Inc. Air Quality Operating Permit Transmittal Number: X276858 MassDEP Approval Number: WE-17-022 Page 12 of 36

	Table 3 (continued)					
Emission Unit Number	Fuel/Raw Material	Pollutant	Operational/ Production Limits	Emissions Limits/Standards <sup>6</sup>	Applicable Regulation and/or Approval No	
	Any	Any VOC None	6 tons per month 58 tons per year <sup>2</sup>	nMCPA WE-17-013		
	Natural Gas	Greenhouse gas <sup>5</sup>		None	310 CMR 7.71 (state only)	
Facility- wide		Total HAP	None	< 25.0 tons per year in any 12 consecutive month period		
		Single HAP	None	< 10.0 tons per year in any 12 consecutive month period	40 CFR 63.6602 Table 2c	
	ANY	РМ	None	$\leq$ 1.0 tons per year in any 12 consecutive month period	Approvals: #1-P-11-003, #WE-18-007 and #WE-19-010	

#### Table 3 Key:

 $NO_x = Nitrogen Oxides;$ CO = Carbon Monoxide;VOC = Volatile Organic Compounds;HAP = Hazardous Air Pollutant;PM-10= Particulate Matter less than or equal to 10 microns in diameter;Opacity = exclusive of uncombined water vapor; $\leq = less$  than or equal to;< = less than or equal to; $\geq =$  greater than or equal to;% = percent

PM = Total Particulate Matter lb./MMBtu = pounds per million British thermal units

#### Table 3 Foot Notes:

- (1) Petroleum hydrocarbon solvents only (containing no halogens)
- (2) Tons per year refers to the cumulative tons emitted in any consecutive 12-month period from all production units at the facility.
- (3) Miscellaneous activities include cleaning, spray booth coating, spindle cleaning, liner/gun cleaning, and golf ball stamping.
- (4) Calculated as a rolling12-month emission rate and determined on a monthly basis. The emission rate shall be determined in accordance with 40 CFR 63.4551(a) through (g). You must include all coatings (as defined in 40 CFR 63.4581), thinners and /or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4490.
- (5) <u>Greenhouse Gas</u> means any chemical or physical substance that is emitted into the air and that the department may reasonably anticipate will cause or contribute to climate change including, but not limited to, CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub>, hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs)
- (6) To calculate the amount of any consecutive 12-month period, take the current calendar month amount and add it to the previous 11 calendar months total amount.

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#### B. <u>COMPLIANCE DEMONSTRATION</u>

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

	Table 4	
Emission Unit Number	Monitoring and Testing Requirements	
5	<ol> <li>In accordance with Approval # WE-17-013, the Permittee shall determine the following:         <ul> <li>a. The type of coatings used in each machine each day;</li> <li>b. Gallons of each coating applied each day;</li> <li>c. The VOC content of the coatings used;</li> <li>d. The pounds of VOC emitted by the operation of golf ball painting machines each day; and</li> <li>e. The total pounds of VOC emitted from the spray booth envelope coating, paint spindle solvent use, paint liner and spray gun and line cleaning, and golf ball stamping associated with the operation of the existing machines each month.</li> </ul> </li> <li>In accordance with Approval # WE-17-013, the Permittee shall track on a daily basis the use of all VOC containing materials, the VOC content of all coatings used, and the emissions of VOCs and HAPs into the ambient air, such that compliance with all of the emission limits can be</li> </ol>	
12	<ul> <li>determined.</li> <li>3. In accordance with 310 CMR 7.18(8)(h), upon request by MassDEP, perform or have performed tests to demonstrate compliance. Testing shall be conducted in accordance with a method approved by MassDEP and EPA.</li> </ul>	
17	<ol> <li>In accordance with 310 CMR 7.04(4)(a), inspect and maintain each boiler in accordance with the manufacturer's recommendations and test each boiler in accordance with the manufacturer's recommendations for efficient operation at least once in each calendar year.</li> <li>In accordance with 40 CFR 63.7500(a)(1) and 63.7515(d), the Permittee shall conduct a tune-up of each boiler annually as specified in 40 CFR 63.7540(a)(10). Each annual tune-up specified in 40 CFR 63.7540(a)(10) must be no more than 13 months after the previous tune-up.</li> </ol>	
	6. In accordance with 40 CFR 63.7540(a)(13), if EU #17 is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.	

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Table 4 (continued)					
Emission Unit Number	Monitoring and Testing Requirements				
17	<ul> <li>7. In accordance with 40 CFR 63.7540(a)(10), the Permittee must conduct an annual tune-up of each boiler to demonstrate continuous compliance as specified below:</li> <li>a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least one every 36 months);</li> <li>b. Inspect the flame pattern, as applicable and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;</li> <li>c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;</li> <li>d. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available;</li> <li>e. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and</li> <li>f. Maintain on-site and submit, if requested by the USEPA or MassDEP, an annual report containing the following information from 40 CFR 63.7540(a)(10)(vi)(A) through (C):</li> <li>i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler;</li> <li>ii. A description of any corrective actions taken as a part of the tune-up; and</li> <li>iiii. The type and amount of fuel used over the 12 months prior</li></ul>				
19, 24,25	8. In accordance with Approval Numbers 1-P-11-003, WE-18-007, WE-19-010 and the best available control technology provision of 310 CMR 7.02(8)(a)2., the Donaldson Oval Dust Collector, Models Downflo Oval 4-32, and 4-16 respectively, associated with the rubber mixing/compounding process, shall be equipped with instrumentation to continuously monitor the differential pressure across the dust collector.				
	<ol> <li>In accordance with Approval Numbers 1-P-11-003 and WE-18-007 and WE-19-010, the Permittee shall monitor the differential pressure across the dust collectors at least once per operating shift while the rubber mixing/compounding process are operating.</li> <li>In accordance with Approval Numbers 1-P-11-003, WE-18-007, and WE-19-010 the Permittee shall monitor the exhaust stack of the dust collectors for any visible emissions from the dust collector at least once per operating shift while the rubber mixing/compounding process is operating to ensure that the dust collector is complying with the visible emission standards in Table 3 herein.</li> </ol>				
19,20,21,24,25	<ol> <li>In accordance with 310 CMR 7.18(8)(h), upon request by MassDEP, perform or have performed tests to demonstrate compliance. Testing shall be conducted in accordance with a method approved by MassDEP and EPA.</li> </ol>				
23	12. In accordance with 310 CMR 7.04(4)(a), inspect and maintain each unit with an individual heat input capacity of greater than or equal to 3 MMBtu/hr. in accordance with the manufacturer's recommendations and tested for efficient operation once each calendar year.				

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	Table 4 (continued)				
Emission Unit Number	Monitoring and Testing Requirements				
Facility- wide	13. In accordance with 310 CMR 7.13 <u>Stack Testing</u> , conduct stack testing, upon written request of the MassDEP, for any air contaminant for which the MassDEP has determined testing is necessary, to ascertain compliance with the MassDEP's regulations or design approval provisos. All such testing shall be conducted in accordance with 310 CMR 7.13 (1) and (2), and in accordance with the applicable procedures specified in 40 CFR 60 Appendix A or other method if approved by the MassDEP and EPA. In accordance with 310 CMR 7.00 Appendix C(9)(b), any emission testing to demonstrate compliance with the allowable emission limits shall be in accordance with EPA Methods 1-5 for particulate matter, Method 7E for NOx, Method 10 for CO, and Method 9 for smoke/opacity, as specified in 40 CFR 60, Appendix A.				
	14. The Permittee shall monitor operations such that information may be compiled for the annual preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12.				
	15. In accordance with 310 CMR 7.71(1) and Appendix C(9) establish and maintain data systems or record keeping practices (e.g., fuel use records, SF6 usage documentation, Continuous Emissions Monitoring System) for greenhouse gas emissions to ensure compliance with the reporting provisions of M.G.L. c. 21N, the Climate Protection and Green Economy Act, St. 2008, c. 298, § 6. (State only requirement)				

#### Table 4 Key:

EU # = Emission Unit;	NOx = Nitrogen Oxides;
CO = Carbon Monoxide;	VOC = Volatile Organic Compound
HAP = Hazardous Air Pollutant;	MMBtu/hr. = million British thermal units per hour
CMR = Codified Massachusetts Regulation; CFR = Codified Federal Regulations;	MassDEP = Massachusetts department of Environmental Protection EPA = United States Environmental Protection Agency

	Table 5				
EU#	Recordkeeping Requirements				
	<ol> <li>In accordance with Approval # WE-17-013 prepare and maintain daily records which shall include, but are not limited to:         <ul> <li>identity, quantity, formulation and density of coating(s) used;</li> <li>identity, quantity, formulation and density of any diluents(s) and clean-up solvent(s) used;</li> <li>solids content of any coating(s) used;</li> <li>actual operational and emission characteristics of the coating line and any appurtenant emissions capture and control equipment; and</li> <li>quantity of product processed.</li> </ul> </li> <li>In accordance with 40 CFR 63.4530(a), the Permittee shall collect and keep a copy of each notification and report</li> </ol>				
	that you submitted to comply with 40 CFR Part 63 Subpart PPPP, and the documentation supporting each notification and report.				
5	3. In accordance with 40 CFR 63.4530(b), the Permittee shall collect and keep a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.				
	<ul> <li>4. In accordance with 40 CFR 63.4530(c) (1) and(3), the Permittee shall collect and keep records for each compliance period which are:</li> <li>a. a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used. (Compliance options are specified in 40 CFR 63.4491)</li> <li>b. a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.4551 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of §63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.4551.</li> </ul>				
	5. In accordance with 40 CFR 63.4530(d), the Permittee shall collect and keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the mass used.				
	<ul> <li>6. In accordance with 40 CFR 63.4530(e), the Permittee shall collect and keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.</li> </ul>				
	<ol> <li>In accordance with 40 CFR 63.4530(f), the Permittee shall collect and keep a record of the mass fraction of coating solids for each coating used during each compliance period.</li> </ol>				
	8. In accordance with 40 CFR 63.4530(g), if you use an allowance in Equation 1 of §63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4551(e)(4), the Permittee must keep records of the information specified in paragraphs (g)(1) through (3) of 40 CFR 63.4530.				

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	Table 5 (continued)	
EU#	Recordkeeping Requirements	
5	9. In accordance with 40 CFR 63.4530(h), the Permittee shall collect and keep a record of the date, time and duration of each deviation.	
	10. In accordance with 310 CMR 7.03(6), establish and maintain a recordkeeping system on-site and in sufficient detail to document the date of construction, substantial reconstruction or alteration and that the respective emission rates, operational limitations, equipment specifications and other requirements pursuant to 310 CMR 7.03 are met. All records shall be maintained up-to-date such that year-to-date information is readily available for Department examination.	
12	<ul> <li>11. In accordance with 310 CMR 7.18(8)(g), prepare and maintain daily records sufficient to demonstrate continuous compliance. Records kept, to demonstrate compliance, shall be kept on site for three years and shall be made available to representatives of the Department and EPA in accordance with the requirements of an approved compliance plan or upon request. Such records shall include, but are not limited to: <ul> <li>a. identity, quantity, formulation and density of solvent(s) used;</li> <li>b. quantity, formulation and density of all waste solvent(s) generated;</li> <li>c. actual operational and performance characteristics of the degreaser and any appurtenant emission capture and control equipment, if applicable; and</li> <li>d. any other requirements specified by the Department in any approval(s) and/or order(s) issued to the person.</li> </ul> </li> </ul>	
15	<ul> <li>12. In accordance with 310 CMR 7.00 Appendix C(10)(b), the permittee shall maintain comprehensive and accurate records onsite to demonstrate compliance with all emission limits contained in Table 3 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15<sup>th</sup> day following each month.</li> </ul>	

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	Table 5 (continued)		
EU#	Recordkeeping Requirements		
17	<ol> <li>In accordance with 310 CMR 7.04(4)(a), maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These said records shall be posted conspicuously on or near each unit.</li> <li>In accordance with Approval #1-P-11-011, the Permittee shall maintain comprehensive and accurate records for EU #17.         <ul> <li>a. The results of routine maintenance activities (tune-ups, inspections, efficiency tests, etc.) on the boiler, including the type or a description of the maintenance performed and the date and time the work was completed.</li> <li>b. Fuel usage (natural gas) in cubic feet, plus fuel heating value and percent sulfur content, as certified by the fuel supplier.</li> <li>c. Annual emissions (12-month rolling totals) of NOx, CO, VOC and PM.</li> </ul> </li> <li>In accordance with Approval #1-P-11-011, the Permittee shall maintain comprehensive and accurate records of all boiler malfunctions which changed the amount of air emissions, including:         <ul> <li>a. The date and time a malfunction occurred;</li> <li>b. A description of the malfunction;</li> <li>c. The corrective actions taken;</li> <li>d. The date and time corrective actions were completed, and the facility returned to compliance.</li> </ul> </li> <li>In accordance with Approval #1-P-11-011, the Permittee shall maintain comprehensive and accurate records of all purchase order and invoices related to boiler operation.</li> <li>In accordance with Approval #1-P-11-011, the Permittee shall maintain comprehensive and accurate records of all purchase order and invoices related to boiler operation.</li> <li>In accordance with APProval #1-P-11-011, the Permittee shall maintain comprehensive and accurate records of all purchase order and invoices related to boiler operation.</li> <li>In accordance with 40 CFR 63.7555(a)(1), th</li></ol>		
19, 24,25	<ul> <li>19. In accordance with Approval Numbers 1-P-11-003, WE-18-007 and WE-19-010, the Permittee shall maintain comprehensive and accurate records of: <ul> <li>a. the differential pressure across the dust collector at a minimum frequency of once per operating shift (in inches of water).</li> <li>b. the visible emission observation of the dust collector exhaust stack at a minimum frequency of once per operating shift.</li> <li>c. the date and time during which any visible emissions were seen as coming from the exhaust of the dust collector and the corrective actions taken to ensure the facility has returned to compliance.</li> <li>d. all inspection and maintenance activities for the dust collector including the replacement of filter cartridges.</li> </ul> </li> </ul>		

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	Table 5 (continued)	
EU#	Recordkeeping Requirements	
	20. In accordance with 310 CMR 7.03(6), establish and maintain a recordkeeping system on-site and in sufficient detail to document the date of construction, substantial reconstruction or alteration and that the respective emission rates, operational limitations, equipment specifications and other requirements pursuant to 310 CMR 7.03 are met. All records shall be maintained up-to-date such that year-to-date information is readily available for Department examination.	
20-21	21. In accordance with 310 CMR 7.18(8)(g) In accordance with 310 CMR 7.18(8)(g), prepare and maintain daily records sufficient to demonstrate continuous compliance. Records kept demonstrating compliance shall be kept on site for five years and shall be made available to representatives of the Department and EPA in accordance with the requirements of an approved compliance plan or upon request. Such records shall include, but are not limited to:	
	<ul><li>a. identity, quantity, formulation and density of solvent(s) used;</li><li>b. quantity, formulation and density of all waste solvent(s) generated;</li></ul>	
	c. actual operational and performance characteristics of the degreaser and any appurtenant emission capture and control equipment, if applicable; and	
	<ul> <li>d. any other requirements specified by the Department in any approval(s) and/or order(s) issued to the person.</li> </ul>	
23	23. In accordance with 413 CMR 7.04(4)(a). maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These days records shall be posted conspicuously on or near each unit.	
Facility - wide	24. In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain records of all monitoring data and supporting information, including all stack test results and all ambient air quality modeling results, on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application.	
	25. In accordance with 310 CMR 7.00 Appendix C(10)(b), the permittee shall maintain comprehensive and accurate records onsite to demonstrate compliance with the facility-wide total and individual HAP emission limits contained in Table 3 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15 <sup>th</sup> day following each month.	
	26. In accordance with 310 CMR 7.12(3)(b), maintain copies of Source Registration and other information supplied to the Department to comply with 310 CMR 7.12, which shall be retained by the facility owner or operator for five (5) years from the date of submittal.	
	27. In accordance with 310 CMR 7.71(6)b. and c. retain at the facility for five (5) years and make available to the Department upon request copies of the documentation of the methodology and date used to quantify emissions. (State requirement only.)	

#### Table 5 Key:

EU # = Emission Unit

- NOx = Nitrogen Oxides CO = Carbon Monoxide
- VOC = Volatile Organic Compound
- PM = Particulate Matter
- HAP = Hazardous Air Pollutant
- RICE= Reciprocating Internal Combustion Engine
- CFR = Code of Federal Regulations
- EPA = Environmental Protection Agency

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	Table 6	
EU#	Reporting Requirements <sup>(1)</sup>	
5	<ol> <li>In accordance with Approval # WE-17-003 and 40 CFR 63.4520, the Permittee shall submit to MassDEP semiannual reports by January 31<sup>st</sup> and July 31<sup>st</sup> of each year indicating its compliance status with emitting no more than 0.26 lb. of HAP per pound of coating solids from its surface coating operations per calendar month based on a rolling 12-month period. The report shall contain the following information.</li> <li>a. Company name and address.</li> <li>b. Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report</li> <li>c. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6- month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.</li> <li>d. Identification of the compliance option or options specified in 40 CFR 63.4491 that you used on each coating operation during the reporting period. If you switched between compliance option s during the reporting period, you must report the beginning and ending dates for each option you used.</li> <li>e. The calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.</li> <li>f. If there were no deviations from the emission limitations in 40 CFR 63.4490 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.</li> <li>g. If there was a deviation from the applicable emission limit in 40 CFR 63.4490, the semiannual compliance report must contain the following information:         <ul> <li>i. The beginning and ending dates of each compliance period during which, the 12-month organic HAP emission rate exceed the applicable emission limit in 40 CFR 63.4490.&lt;</li></ul></li></ol>	
12	<ol> <li>In accordance with 310 CMR 7.03(5) report to MassDEP any construction, substantial reconstruction or alteration, as described in 310 CMR 7.03, on the next required source registration.</li> </ol>	
_	<ol> <li>In accordance with 40 CFR 63.7550(a), (b)(1) through (b)(4), the permittee shall submit an annual compliance report which must cover the applicable one-year period from January 1 to December 31. Each annual compliance report must be postmarked no later than January 31.</li> <li>In accordance with 40 CFR 63.7550(a) and (c), the annual compliance report must contain the following information.</li> </ol>	
17	<ul> <li>information:</li> <li>a. Company name and address.</li> <li>b. Process unit information, emissions limitations, and operating parameter limitations.</li> <li>c. Date of report and beginning and ending dates of the reporting period.</li> <li>d. The total operating time during the reporting period.</li> <li>e. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled unit shutdown.</li> <li>5. The Permittee shall comply with all applicable reporting requirements contained in 40 CFR 60.48c.</li> </ul>	

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		Table 6 (continued)
EU#		Reporting Requirements <sup>(1)</sup>
17	6.	In accordance with 40 CFR 63.7550(h)(3), the Permittee must submit all reports required by Table 9 of 40 CFR 63 Subpart DDDDD electronically using Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX)(www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due you must submit the report to the Administrator at the appropriate address listed in §63.13. At the discretion of the Administrator, you must also submit these reports, to the Administrator in the format specified by the Administrator.
20, 21	7.	In accordance with 310 CMR 7.03(5) report to MassDEP any construction, substantial reconstruction or alteration, as described in 310 CMR 7.03, on the next required source registration.
	8.	Submit a Source Registration/Emission Statement Form to MassDEP on an annual basis as required by 310 CMR 7.12.
	9.	In accordance with 310 CMR 7.13(1) and 7.13(2), if determined by the Department that stack testing is necessary to ascertain compliance with the Department's regulations or design approval provisos shall cause such stack testing to be summarized and submitted to the Department as prescribed in the agreed to pretest protocol.
	10.	In accordance with 310 CMR 7.00 Appendix C(10)(a), submit to MassDEP any record relevant to this operating permit or to the emissions of any air contaminant from the facility within 30 days of the request by MassDEP or EPA.
	11.	In accordance with 310 CMR 7.00: Appendix C(10)(c), the Permittee shall report a summary of all monitoring data and related supporting information to MassDEP at least every six months (January 30 and July 30 of each calendar year).
Facility- wide	12.	General Condition 10 of this Permit.
	13.	In accordance with 310 CMR 7.71(5), by April 15 <sup>th</sup> , 2010, and April 15 <sup>th</sup> of each year thereafter report emissions of greenhouse gases from stationary emissions sources including, but not limited to, emissions from factory stacks, manufacturing processes and vents, fugitive emissions, and other process emissions; and owned or leased motor vehicles when stationary source greenhouse gas emissions are greater than 5,000 short tons CO2e. Report greenhouse gas emissions electronically in a format that can be accommodated by the registry. (State only requirement)
	14.	In accordance with 310 CMR 7.71(6), certify greenhouse gas emissions reports using a form provided by the Department or the registry. (State only requirement)
	15.	In accordance with 310 CMR 7.71(7), by December 31 <sup>st</sup> of the applicable year submit to the Department documentation of triennial verification of the greenhouse gas emissions report. (State only requirement)
Table 6 Ke	ev:	EU # = Emission Unit; CO2e = Carbon Dioxide Equivalent; HAP = Hazardous Air Pollutant

Table 6 Key:

EU # = Emission Unit; CO2e = Carbon Dioxide Equivalent; HAP = Hazardous Air Pollutant CFR = Code of Federal Regulations; EPA = Environmental Protection Agency

#### Table 6 Foot Notes:

(1) The annual Source Registration/Emission Statement report shall be submitted to MassDEP as specified in the instructions. All other reports, including both 6-month summary reports, are to be submitted to the Western Regional Office.

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### A. <u>GENERAL APPLICABLE REQUIREMENTS</u>

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.

### B. <u>REQUIREMENTS NOT CURRENTLY APPLICABLE</u>

The Permittee is currently not subject to the following requirements:

	Table 7
Regulation	Reason
40 CFR Part 63 Subpart T: National Emission Standards for Halogenated solvent Cleaning	Not Applicable
40 CFR Part 64: Compliance Assurance Monitoring	Not Applicable
310 CMR 7.25: Consumer and Commercial Products	Not Applicable

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# 5. <u>SPECIAL TERMS AND CONDITIONS</u>

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

Table 8		
EU#	Special Terms and Conditions	
5	<ol> <li>EU #5 is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products 40 CFR 63.4480 through 60.4581 and shall comply with all applicable requirements.</li> <li>In accordance with Approval #1-P-93-036, a water curtain shall be operated in conjunction with the paint machines during any time that coatings are being applied.</li> </ol>	
12	<ol> <li>In accordance with 310 CMR 7.18(8)(a)3., ensure that each immersion cold cleaning degreaser complies with the following requirements         <ul> <li>Each cold cleaning degreaser is equipped with a cover that is designed to be easily operated with one hand;</li> <li>Each cold cleaning degreaser is equipped to drain clean parts so that, while draining, the cleaned parts are enclosed for 15 seconds or until dripping ceases, whichever is longer;</li> <li>Each cold cleaning degreaser is designed with;                 <ul></ul></li></ul></li></ol>	
	<ol> <li>In accordance with 310 CMR 7.18(8)(a)1., use solvent in the cold cleaning degreaser which has a vapor pressure that does not exceed 1.0 mm Hg measured at 20 degrees Celsius. This requirement shall not apply to the following:         <ul> <li>a. cold cleaning degreasers used in special and extreme solvent metal cleaning;</li> <li>b. cold cleaning degreasers for which the owner or operator has received Department approval of a demonstration that compliance with the requirement to use a solvent with a vapor pressure of 1.0 mm Hg or less at 20 degrees Celsius will result in unsafe operating condition;</li> <li>c. cold cleaning degreasers that are located in a permanent total enclosure having control equipment that is designed and operated with an overall VOC control efficiency of 90% or greater.; and,</li> <li>d. cold cleaning degreasers used in the cleaning of high precision products for which the owner or operator has received Department and EPA approval.</li> </ul> </li> </ol>	
	<ol> <li>In accordance with 310 CMR 7.18(8)(a)2., immediately repair any leaks, or the degreaser shall be shut down.</li> </ol>	

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	Table 8 (continued)	
EU#	Special Terms and Conditions	
12	<ul> <li>7. In accordance with 310 CMR 7.18(8)(e)1. through 3, operate any solvent metal degreaser using procedures which minimize evaporative emissions and prohibit spills from the use of said degreaser. Such procedures include but are not limited to: <ul> <li>a. notification to operators of the performance requirements that must be practiced in the operation of the degreaser, including the permanent and conspicuous posting of labels in the vicinity of the degreaser detailing performance requirements; and</li> <li>b. storage of waste degreasing solvent in closed containers, and disposal or transfer of waste degreasing solvent to another party, in a manner such that less than 20% of the waste degreasing solvent by weight can evaporate into the atmosphere; and</li> <li>c. where applicable, supplying a degreasing solvent spray which is a continuous fluid stream (not a fine, atomized or shower type spray) at a pressure which does not exceed ten pounds per square inch as measured at the pump outlet, and use any such spray within the confines of the degreaser.</li> </ul> </li> <li>8. In accordance with 310 CMR 7.18(8)(f), maintain instantaneous and continuous compliance at all times.</li> </ul>	
17	<ul> <li>9. EU #17 is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60.40c through 60.48c and shall comply with all applicable standards.</li> <li>10. EU #17 is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63.7480 through 63.7575 and shall comply with all applicable standards no later than the date of publication in the Federal Register.</li> <li>11. In accordance with 40 CFR 63.7500 (a)(3), the Permittee must, at all times, operate and maintain each boiler, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the USEPA and MassDEP that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.</li> </ul>	
	<ol> <li>In accordance with Approval #1-P-11-011, the Permittee shall configure each boiler stack to discharge stack gases vertically upwards.</li> <li>In accordance with Approval #1-P-11-011, the Permittee shall not have rain protection of a type that restricts the vertical exhaust flow of the combustion gases as they are emitted to the ambient air from each boiler stack.</li> </ol>	
19,	14. In accordance with Approval numbers 1-P-11-003 and WE-18-007 and the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall keep on hand a sufficient quantity of spare cartridge filters for the dust collectors associated with each rubber mixing/compounding process are in order to be able to immediately replace any cartridge filters requiring replacement due to deterioration resulting from routine operation.	
24,25	15. In accordance with Approval numbers 1-P-11-003, WE-18-007 and WE-19-010, the rubber mixing/compounding process shall consist of hand mixing areas, kneaders, Barwell mills, extruders, dusters and work- tables and unitized mill mixers, as described in each approval. Additionally, the kneader areas, each duster and each work-station shall be controlled by Donaldson Oval Dust Collectors, Model DFO 4-32 and Model Downflo Oval 4-16(respectively), or better. The dust collector shall be operated at all times during the operation of the rubber mixing/compounding process.	

	Table 8 (continued)	
EU#	Special Terms and Conditions	
19, 24, 25	<ul> <li>16. In accordance with Approval numbers 1-P-11-003, WE-18-007 and WE-19-010, the Donaldson Oval Dust Collector, Model Downflo Oval 4-32, and Model Downflo Oval 4-16, shall have a minimum of the following collection/pickup points: <ul> <li>Two collection points at each duster</li> <li>One collection point at each work-table</li> <li>Two collection points at the kneader</li> <li>More than stated above if so indicated in the application or plan approval</li> </ul> </li> </ul>	
20	<ul> <li>17. In accordance with 310 CMR 7.18(8)(a)3., ensure the remote solvent reservoir has an open drain area less than 100 square centimeters, otherwise the requirements of 310 CMR 7.18(8)(a)3.a e. shall apply.</li> </ul>	
	18. In accordance with 310 CMR 7.18(1)(c), store and dispose of volatile organic compounds (VOCs) 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 MassDEP, transfer to another person licensed by MassDEP to handle VOC, or any other equivalent method approved by MassDEP.	
	<ul> <li>19. In accordance with 310 CMR 7.18(8)(a)1., use solvent in the cold cleaning degreaser which has a vapor pressure that does not exceed 1.0 mm Hg measured at 20 degrees Celsius. This requirement shall not apply to the following: <ul> <li>a. cold cleaning degreasers used in special and extreme solvent metal cleaning;</li> <li>b. cold cleaning degreasers for which the owner or operator has received Department approval of a demonstration that compliance with the requirement to use a solvent with a vapor pressure of 1.0 mm Hg or less at 20 degrees Celsius will result in unsafe operating condition;</li> <li>c. cold cleaning degreasers that are located in a permanent total enclosure having control equipment that is designed and operated with an overall VOC control efficiency of 90% or greater; and</li> <li>d. cold cleaning degreasers used in the cleaning of high precision products for which the owner or operator has received Department and EPA approval.</li> </ul> </li> </ul>	
	20. In accordance with 310 CMR 7.18(8)(a)2., immediately repair any leaks, or the degreaser shall be shut down.	
20, 21	<ul> <li>21. In accordance with 310 CMR 7.18(8)(e)1. through 3, operate any solvent metal degreaser using procedures which minimize evaporative emissions and prohibit spills from the use of said degreaser. Such procedures include but are not limited to: <ul> <li>a. notification to operators of the performance requirements that must be practiced in the operation of the degreaser, including the permanent and conspicuous posting of labels in the vicinity of the degreaser detailing performance requirements; and</li> <li>b. storage of waste degreasing solvent in closed containers, and disposal or transfer of waste degreasing solvent to another party, in a manner such that less than 20% of the waste degreasing solvent by weight can evaporate into the atmosphere; and</li> <li>c. where applicable, supplying a degreasing solvent spray which is a continuous fluid stream (not a fine, atomized or shower type spray) at a pressure which does not exceed ten pounds per square inch as measured at the pump outlet, and use any such spray within the confines of the degreaser.</li> </ul> </li> </ul>	
ļ	22. In accordance with 310 CMR 7.18(8)(f), maintain instantaneous and continuous compliance at all times.	
21	<ul> <li>23. In accordance with 310 CMR 7.18(8)(d), any aqueous cleaner in which all the following conditions are satisfied is exempt from the requirements of 310 CMR 7.18(8)(a)(b), and (c):</li> <li>a. All organic material in the cleaning fluid is water soluble; and</li> <li>b. The cleaning fluid contains no more than 5% by weight organic material, excluding soaps.</li> </ul>	
5, 17	<ul> <li>EU # 5 is subject to the requirements of 40 CFR 63.1-10, 12-15, Subpart A, "General Provisions" [as indicated in Table"2" to Subpart PPPP of 40 CFR 63]. EU # 17 is subject to the requirements of 40 CFR 63.1-10, 12-15, Subpart A, "General Provisions" [as indicated in Table"10" to Subpart DDDDD of 40 CFR 63].</li> </ul>	

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Table 8 (continued)	
EU#	Special Terms and Conditions
	25. In accordance with 310 CMR 7.10, the Permittee shall not cause or allow emissions of sound of sufficient intensity and/or duration as to cause or contribute to a condition of air pollution. (State enforceable only)
	26. In accordance with 310 CMR 7.09, the Permittee shall not cause or allow emissions of odor or dust that cause or contribute to a condition of air pollution. (State enforceable only)
Facility- wide	<ol> <li>The Permittee is subject to and has indicated that the Permittee is in compliance with the requirements of 310 CMR 7.16: Reduction of Single Occupant Commuter Vehicle Use.</li> </ol>
	28. The Permittee is subject to, and has stated in the initial Operating Permit application, TR#W150669, that the Permittee is in compliance with the requirements of 40 CFR 82: Protection of Stratospheric Ozone. These requirements are applicable to this facility and the United States Environmental Protection Agency enforces these requirements.

 Table 8 Key:
 EU# = Emission Unit Number

 CMR = Codified Massachusetts Regulation; MassDEP = Massachusetts Department of Environmental Protection

 CFR = Codified Federal Regulation; USEPA = United Stated Environmental Protection Agency

 VOC = Volatile Organic compounds;
 mm Hg = millimeters of mercury (measure of pressure)

 % = percent

### 6. <u>ALTERNATIVE OPERATING SCENARIOS</u>

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

### 7. <u>EMISSIONS TRADING</u>

### A. INTRA-FACILITY EMISSION TRADING

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

### B. INTER-FACILITY EMISSION TRADING

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

### 8. <u>COMPLIANCE SCHEDULE</u>

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.

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# **GENERAL CONDITIONS FOR OPERATING PERMIT**

### 9. <u>FEES</u>

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. <u>COMPLIANCE CERTIFICATION</u>

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

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

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

#### A. <u>Annual Compliance Report and Certification</u>

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

The compliance certification and report shall describe:

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

#### B. <u>Semi-Annual Monitoring Summary Report and Certification</u>

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

The compliance certification and report shall describe:

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

### 11. <u>NONCOMPLIANCE</u>

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. <u>PERMIT SHIELD</u>

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

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

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

### 13. <u>ENFORCEMENT</u>

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.04(9), 7.05(8), 7.18(1)(b), 7.70, 7.71, 7.72, 7.74, 7.75, 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. <u>PERMIT TERM</u>

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

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

### 15. <u>PERMIT RENEWAL</u>

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).

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### 16. <u>REOPENING FOR CAUSE</u>

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. <u>DUTY TO SUPPLEMENT</u>

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

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

### 19. TRANSFER OF OWNERSHIP OR OPERATION

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

## 20. <u>PROPERTY RIGHTS</u>

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

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### 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. <u>PERMIT AVAILABILITY</u>

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

### 23. <u>SEVERABILITY CLAUSE</u>

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.

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### 24. <u>EMERGENCY CONDITIONS</u>

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.

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. <u>PERMIT DEVIATION</u>

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

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

A. Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.

<sup>&</sup>lt;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 source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

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- B. Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the Permit or approval as surrogate for an emission limit.
- C. Exceedances of Permit operational limitations directly correlated to excess emissions.
- D. Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- E. Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the MassDEP Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available to the Permittee via the MassDEP's web site, <u>http://www.mass.gov/dep/air/approvals/aqforms.htm#op</u>. This report shall include the deviation, including those attributable to upset conditions as defined in the Permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

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

### 26. **OPERATIONAL FLEXIBILITY**

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

### 27. MODIFICATIONS

- A. Administrative Amendments The Permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).
- B. Minor Modifications The Permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2.,provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d).

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

### 28. OZONE DEPLETING SUBSTANCES

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

- A. The Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - 1) All containers containing a class I or class II substance that is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR 82.106.
  - 2) The placement of the required warning statement must comply with the requirements of 40 CFR 82.108.
  - 3) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR 82.110.
  - 4) No person may modify, remove or interfere with the required warning statement except as described in 40 CFR 82.112.
- B. The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVAC) in Subpart B:
  - 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices of 40 CFR 82.156.
  - 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment of 40 CFR 82.158.
  - 3) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - 4) Persons disposing of small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152) must comply with recordkeeping requirements of 40 CFR 82.166.
  - 5) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair equipment requirements of 40 CFR 82.156.
  - 6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

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- C. If the Permittee manufactures, transforms, imports or exports a class I or class II substance, the Permittee is subject to all the requirements as specified in 40 CFR Part82, Subpart A, "Production and Consumption Controls".
- D. If the Permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners". The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.
- E. The Permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

### 29. PREVENTION OF ACCIDENTAL RELEASES

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

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

RENEWED OPERATING PERMIT Callaway Golf Ball Operations, Inc. Air Quality Operating Permit Transmittal Number: X276858 MassDEP Approval Number: WE-17-022 Page 36 of 36

# 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) and a completed Adjudicatory Hearing Fee Transmittal Form found at <a href="http://www.mass.gov/eea/docs/dep/service/adr/adjherfm.doc">http://www.mass.gov/eea/docs/dep/service/adr/adjherfm.doc</a> 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.