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fact sheet

3M Rockland • 30 Commerce Road, Rockland

Non-Major Comprehensive Plan Application No. 25-AQ02P-0006-APP

Introduction

The Massachusetts Department of Environmental Protection (“MassDEP” or the “Department”) regulates emissions to air from various sources, such as industrial facilities, power plants, and other operations, through the issuance of permits and approvals. These permits outline specific limits and requirements for emissions of certain air pollutants. The purpose of these permits is to ensure facilities operate in compliance with state and federal air quality regulations, protecting public health, safety or the environment. MassDEP evaluates permit applications, sets emission limits based on factors like air quality standards and technological feasibility, and may require facilities to implement pollution control measures or monitoring systems. Facilities must apply for and obtain an air permit or approval before constructing or modifying operations that could potentially emit air pollutants. Compliance with the conditions outlined in the permit is essential to avoid enforcement actions and potential penalties from MassDEP. Regular inspections as well as testing and monitoring may also be conducted to verify compliance with requirements.

3M Rockland has filed an Air Quality Non-Major Comprehensive Plan Application (“NMCPA”) No. 25-AQ02P-0006-APP (“the application”) with MassDEP for the modification of operations at an existing pressure sensitive tape manufacturing facility at 30 Commerce Road, Rockland, Massachusetts (“Facility”). If approved, this will result in a significant decrease to the facility’s permitted emissions of criteria pollutants, including a 33% decrease to volatile organic compounds and a 73% decrease to total Hazardous Air Pollutants.

The proposed operation of the Facility is subject to the Massachusetts Air Pollution Control Regulations (310 CMR 7.00). Prior to commencing construction, the Facility operator is required to apply for and obtain a permit, known as an “Approval.” Currently, MassDEP is in the process of reviewing the application. Upon completion of the review, MassDEP will issue a proposed decision, either approving or denying the application. Subsequently, a 30-day public comment period will be provided on the proposed decision. Information regarding how to review the application, receive notification of MassDEP’s proposed decision, and submit comments can be found in the “*How to Comment*” section of this Fact Sheet.

Facility Information

3M Rockland (the “Permittee”) operates a pressure-sensitive adhesive tape (PSA tape) manufacturing Facility. Operations include the application of adhesives to paper, metal foil and films on two (2) coating lines that use various coating applications. Additional operations at the Facility include the mixing, storage and transportation of adhesive materials as well as equipment cleaning and degreasing.

On August 9, 2012, MassDEP approved the Facility’s currently active NMCPA (Application No. SE-12-007) for the operation of four (4) coating lines and the construction and operation of a regenerative thermal oxidizer used to control emissions from these lines. The coating lines, adhesive operations and cleaning operations all generate emissions of volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs). Most of these operations are performed within a certified permanent total enclosure which vents emissions directly to the regenerative thermal oxidizer for treatment. The 2012 Approval limited emissions of VOCs and HAPs from the approved operations to less than 49.51 tons of VOCs, 9.9 tons of any single HAP, and 24.9 tons of total HAPs per consecutive 12-month period.

In November 2023, MassDEP conducted an onsite compliance inspection of the Facility and identified the adhesive storage and delivery processes, including two large adhesive storage tanks, as unpermitted emission sources. The addition of VOC emissions from these operations to the existing VOC limit of 49.51 tons per consecutive 12-month period would cause the facility to exceed the VOC major source threshold of 50 tons per year, subjecting the facility to major source Operating Permit requirements.

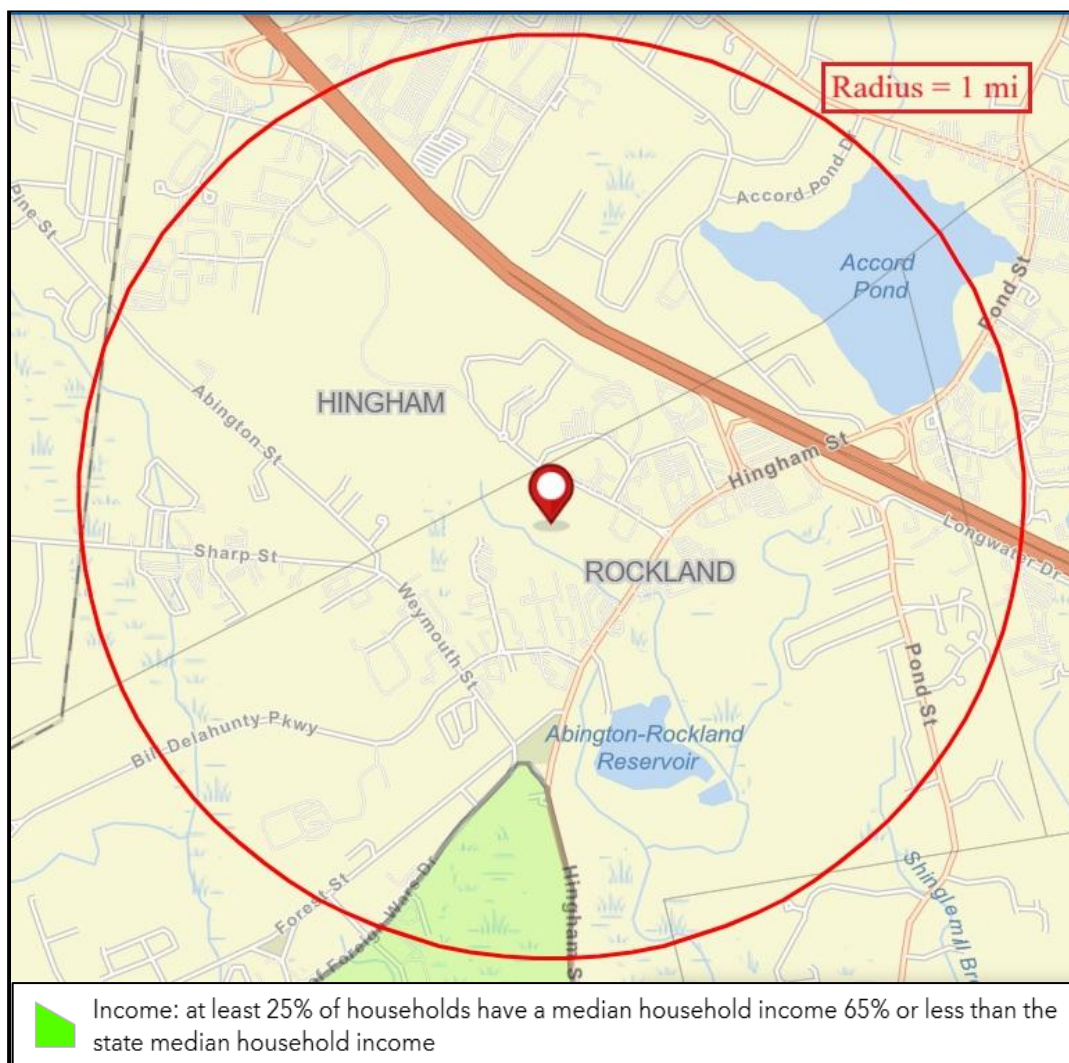
Based on the inspection conducted and additional information received, MassDEP’s Southeast Regional Office, Bureau of Air & Waste Compliance and Enforcement Section entered into an Administrative Consent Order with Penalty in May 2025 for violating the Plan Approval and Emission Limitations requirement of 310 CMR 7.02(3)(a). The Administrative Consent Order with Penalty required the Permittee to submit the appropriate Air Quality Plan Application in accordance with 310 CMR 7.02.

Environmental Justice

Environmental Justice (“EJ”) centers around the belief that everyone deserves protection from pollution and the opportunity to thrive in a clean, healthy environment. It embodies the idea of fair treatment and meaningful participation for all individuals regarding the creation, execution, and enforcement of environmental regulations, as well as the fair allocation of environmental advantages. MassDEP employs United States census data to pinpoint census block groups designated as environmental justice areas, using criteria such as income, minority population percentage, and language accessibility. MassDEP is dedicated to ensuring that inhabitants of EJ areas have the opportunity for meaningful engagement in MassDEP activities within their community. For more information on MassDEP’s EJ program please visit <https://www.mass.gov/environmental-justice> or [MassDEP’s Environmental Justice Program | Mass.gov](#) or you can also contact Debbie Marshall-Hewlitt, MassDEP’s Southeast Regional Office Environmental Justice Coordinator, at Deborah.marshall-hewlitt@mass.gov , (774) 384-3564.

MassDEP is required to look at the population within a one-mile radius of facilities submitting a Non-Major Comprehensive Plan Application. Within the applicable one-mile radius of the Facility, the following EJ designated area has been identified: Block Group 2, Census Tract 5022 by the criteria Income. This data was obtained from the EEA EJ Map Viewer Tool at <https://www.mass.gov/info-details/massgis-data-2020-us-census-environmental-justice-populations> or [MassGIS Data: 2020 Environmental Justice Populations | Mass.gov](#).

Within one mile of the facility there are identified census tracts where at least 5% of the population has Portuguese speakers in the homes of public school students, who reported they speak a language other than English. Accordingly, this EJ Fact Sheet and forthcoming Notice of Public Comment period will be translated into Portuguese and circulated within the community.



Project Information

VOCs and HAPs are emitted from the Facility during PSA tape production processes, along with combustion emissions from various auxiliary fuel-burning processes. The majority of VOC and HAP emissions are generated from two (2) PSA tape production/coating lines at the Facility. Previously, the Facility was issued an Approval in 2012 to operate four (4) lines, but two have since been decommissioned. The facility additionally operates a mixing room and two rooms for the storage of adhesives shipped onsite. One of these storage rooms contains two 16,400-gallon tanks for the storage of adhesive.

All VOC and HAP emissions from the production/coating lines, mixing room, and 16,400-gallon tanks are collected and routed to a thermal oxidizer control device prior to ventilation to the atmosphere. The control device is designed to have 100% emission capture efficiency and 99% or greater VOC destruction efficiency. These efficiencies are confirmed via EPA Method 204 Permanent Total Enclosure demonstration and periodic emissions testing. The Permittee has additionally proposed short-term and long-term operational and emission limitations on each PSA tape production process.

With the proposed operational restrictions, the Facility's maximum potential emissions will be approximately 35.95 tons of VOCs per consecutive 12-month period and 6.78 tons of total HAPs per consecutive 12-month period. These emissions will be in addition to emissions of nitrogen oxides ("NO_x"), carbon monoxide ("CO"), sulfur dioxide ("SO₂"), particulate matter ("PM"), VOC and HAPs emitted from the Facility's fuel burning equipment. Please see the following table for illustration purposes:

Facility Potential Emissions (Tons per consecutive 12-month period)						
	VOC	NO _x	CO	PM	SO ₂	HAP (Combined)
Current Facility-wide Potential to Emit ¹	54.04	40.98	25.60	2.95	0.24	25.25
Proposed Facility-wide Potential to Emit ¹	35.95	10.94	9.25	2.31	0.31	6.78
Proposed Change in Emissions	- 18.09	- 30.04	- 16.35	- 0.64	+ 0.07	- 18.47
Proposed Change in Emissions by percent	- 33%	- 73%	- 64%	- 22%	+ 29%	- 73%

1: Includes both permitted and insignificant emissions.

How to Comment

MassDEP is currently reviewing Application No. 25-AQ02P-0006-APP. The permit application is currently available for public review via the EEA ePLACE Public Access Portal:

<https://eeaonline.eea.state.ma.us/EEA/PublicApp/> or [Search EEA Projects](#) .

On the main Executive Office of Energy and Environmental Affairs (“EEA”) ePLACE Portal page, click on the orange “Search and/or Comment” button, then click on the name of the applicant/facility on the resulting page.

After MassDEP completes its review of the permit application, the agency will issue a proposed decision subject to a 30-day public comment period. This information will also be posted in the ePLACE Public Access Portal.

Contact Information

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