Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
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FINAL AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("The Department") 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"]:
Wyman- Gordon Company division of
Precision Castparts Corp. (PCC)
PO Box 8001
244 Worcester Street
North Grafton, MA 01536-8001

INFORMATION RELIED UPON:
Transmittal No. W063510
Transmittal No. 115596 (OP expired 12/1/05)
Transmittal W122581 (Minor Modification)
Transmittal No. X24037 (Administrative Amendment)

FACILITY LOCATION:
244 Worcester Street
North Grafton, MA 01536-8001

FACILITY IDENTIFYING NUMBERS:

FMF FAC No	130861
FMF RO No.	161305
SSEIS No.	118-039

NATURE OF BUSINESS:

Manufacturer of Ferrous and Non Ferrous Alloy Forgings

STANDARD INDUSTRIAL CLASSIFICATION (SIC):
3463, 3462

RESPONSIBLE OFFICIAL:

Name	Authorized Representative
Title	General Manager - Grafton

FACILITY CONTACT PERSON:

Name	Mary Cushner
Title	Senior Environmental Engineer
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This Operating Permit shall expire on July 9, 2012.

For the Department of Environmental Protection, Bureau of Waste Prevention

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Roseanna E. Stanley
Acting Permit Section Chief

Administrative Amendment 03/28/2012
Date

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SPECIAL CONDITIONS FOR OPERATING PERMIT

A Legend to Abbreviated Terms found in the following Tables is located in Section 28 of the Operating Permit.

1. PERMITTED ACTIVITIES

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

A. DESCRIPTION OF FACILITY AND OPERATIONS

Wyman Gordon Company is located at 244 Worcester Road in North Grafton, Massachusetts. The facility is a manufacturer of ferrous and nonferrous alloy forgings. Raw materials consist primarily of steel, titanium and high temperature alloys. Stock is cut to size, forged, machined and heat-treated. A majority of the products are used for aerospace and land-based turbines and commercial power plants. Table 3 identifies the emissions and the applicable requirements for each emission unit. Tables 4, 4A-4G, 5, and 6 describe monitoring, recordkeeping and reporting requirements that the facility must comply with. The Permittee is no longer applicable to requirements of 42 U.S.C. 7401, 112 (r) (7) Accidental Release Prevention Requirements: Risk Management under the Clean Air Act .

The Permittee is subject to Compliance Assurance Monitoring (CAM) pursuant to 40 CFR 64. The facility is major for NOx. The facility operates nine (9) acid scrubbers to control NOx emissions from the etching process (EU#6). The units have pre-control potential NOx emissions greater than the major source threshold (50 tons per year). In addition, the facility has several emission units that are equipped with particulate matter (PM) control equipment. As such, Tables 4 A – 4F describe the operating parameters i.e. opacity, water flow, pH and static pressure, monitored to ensure compliance with emission limits.

2. EMISSION UNIT IDENTIFICATION

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

Table 1

EU#	Description Of Emission Unit	EU Design Capacity	Pollution Control Device
1	Cleaver Brooks Boilers	2 boilers 14.65mm BTU/hr ea.	None
2	Furnaces TR#W120151 (Salem –Brosius furnace WG# 2998)	26 furnaces with ratings from 10-40 MMBtu/hr	None
3	6,000 and 18,000 Ton Presses (CM-75-IF-020, CM-84-IF-037)		ESP 98% control efficiency PM
4	35,000 and 50,000 Ton Presses (CM-77-IF-008)		ESP 95% control efficiency PM
5	4 Billet Grinders (Midwest Grinders) (C-P-90-064)		Two (2) Baghouses 97 % control efficiency PM
6	Chemical Etching and Milling (CM-78-IF-008, CM-76-IF-025 W003949/W122581)		9 Scrubbers 96% control efficiency acid gases and caustic mists and 30% for NOx control, 99% removal of liquid particulate.
7	Grit Blasting and Cleaning (Pangborn) (C-P-88-058 /W006130/W122581)		Baghouse 99% control efficiency of PM
8	17’ Rotary Hearth Furnace (126883)	17,760,000 btu/hr	None
9	30’ Rotary Hearth Furnace (W003112)	31,500,000 btu/hr	None
10	Swing frame grinders (CM-75-IF-014)		**b**aghouse preceded by cyclones with 95% control efficiency PM
11	Parts cleaners	varies	Work practices
12	Stock cutting (118972)		Cartridge filter 95.1% control efficiency for PM
13	Wheelabrator (W003337/W122581)		Cartridge collector 99.5% control
14	30’ rotary furnace (W003111)	31,500,000 btu/hr	None
15	Gasoline storage tank	4000 gallons	Stage I & II vapor recovery
16	Hot Flash Burning (W007707)		ESP 98% control efficiency for PM/smoke tied into ESP serving EU#3
17	Hot Flash Burning		Micropul baghouse 99% PM control efficiency
18	Wheelabrator #4885		Baghouse 98% PM control efficiency

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 Department's Regional Office. Emissions from these activities shall be reported on the annual emissions statement pursuant to 310 CMR 7.12.	310 CMR 7.00:Appendix C(5)(h)

4. APPLICABLE REQUIREMENTS

A. EMISSION LIMITS AND RESTRICTIONS

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

Table 3					
EU #	**Fuel or Raw Material**	**Pollutant**	**Emission Limit/Standard**	**Applicable Regulation And/or (Approval No.)**	**Restrictions**
EU# 1	Natural Gas	Smoke	Not to exceed No.1 [1]	310 CMR 7.06(1)(a)	
		Opacity	Not to exceed 20% [2]	310 CMR 7.06(1)(b)	
		PM	0.10 lbs/mmbtu	310 CMR 7.02(8) table 6	
EU# 2 2007 modified furnace	Natural gas	Opacity	Not to exceed 5% (Salem Brosius furnace modified 2007)	TR # W120151	
		PM	0.10 lbs /mmbtu (Salem Brosius furnace modified 2007)	TR # W120151 310 CMR 7.02(8) table 6	
2 Existing furnace	Natural gas	Opacity	Not to exceed 20% [2]	310 CMR 7.06(1)(b)	
		PM	0.12 lbs/mm btu/hr	310 CMR 7.02(8) table 4	
EU#3	Metal	PM	98%+ controlled by ESP	#CM-75-IF-020 #CM-84-IF-037	
		Smoke	Not to exceed No.1 [1]	310 CMR 7.06(1)(a)	
		Opacity	Not to exceed 20% [2]	310 CMR 7.06(1)(b)	
EU#4	Metal	PM	95% controlled by ESP	#CM-77-IF-008	

Table 3

EU #	Fuel or Raw Material	Pollutant	Emission Limit/Standard	Applicable Regulation And/or (Approval No.)	Restrictions
		Smoke	Not to exceed No.1 [1]	310 CMR 7.06(1)(a)	
		Opacity	Not to exceed 20% [2]	310 CMR 7.06(1)(b)	
EU#5	Metal Billets	PM	0.008 gr/ACF, 1.4 lb/hr & 6.13 ton/yr each baghouse with 97% efficiency	C-P-90-064, #115595	Differential pressure drop 0-10 inch water (w.c.)
		Opacity	Less than 5%		
EU#6	Metal forgings	Acids & caustic mists /fumes	96% controlled by 9 packed bed scrubbers	CM-76-IF-025 CM-78-IF-008 TR# W122581 (minor mod)	Scrubber liquor is treated and neutralized for recirculation.
		PM	99% removal efficiency by mist eliminator		Maintain the scrubbing water pH between 6-9 and static pressure across the plenum at 1.25-5 inch water (w.c.)
		NOx	30% removal efficiency 24.6 tons/yr, 4.6 tons/mo	W003949	
		Opacity	Not to exceed 20% [2]	310 CMR 7.06(1)(b)	
EU#7	Metal	PM	99% + removal efficiency by baghouse 0.2lb/hr, 9 ton/yr	C-P-88-058 /W006130. TR# W122581 (minor mod)	Pressure differential of 2-10 inch across the baghouse
		Opacity	Not to exceed 10%		
EU#8	Natural gas	Opacity	0%	#126883	
		Smoke	Not to exceed NO. 1 [1]	310 CMR 7.06(1)(a)	
		PM	0.10 lbs/mmbtu	310 CMR 7.02(8) table 6	
EU#9	Natural gas	Opacity	0%	W003112	
		Smoke	Not to exceed NO. 1 [1]	310 CMR 7.06(1)(a)	
		PM	.10 lbs/mmbtu	310 CMR 7.02(8) table 6	
EU#10	Metal forgings	PM	> 95% removal efficiency baghouse preceded by cyclones	CM-75-IF-014	
		Opacity	0%		
EU#11	Solvents	VOC		310 CMR 7.03(8), 7.18(8)- work practices	<100 gallons/month see section 5 special conditions
EU#12	Metal	Opacity	Not to exceed 10%	118972	
		PM	95.1% overall control efficiency		
EU#13	Metal shot	PM	4283.6 lbs/yr 99.5% control efficiency	W003337/W122581	Differential pressure drop 2-10 in water (w.c.)
		Opacity	Not to exceed 10%		

Table 3

EU #	Fuel or Raw Material	Pollutant	Emission Limit/Standard	Applicable Regulation And/or (Approval No.)	Restrictions
EU#14	Natural gas	Opacity	0%	W003111	
		Smoke	Not to exceed NO. 1 [1]	310 CMR 7.06(1)(a)	
		PM	.10 lbs/mmbtu	310 CMR 7.02(8) table 6	
EU#15	Gasoline	VOC	Submerged fill	310 CMR 7.24(3)(a)	
			Stage I Vapor Recovery	310 CMR 7.24(3)(b)	
			Stage II Vapor Recovery	310 CMR 7.24(6)(a) 2.	
EU#16	Metal	PM	2560 lbs/yr 98% control efficiency	W007707	
		Opacity	Not to exceed 10%		
EU#17	Metal	PM	3314.8 lbs/yr 99% control efficiency	W008396[3] W122581	Differential pressure range shall be between 2-10 in water (w.c.)
		Opacity	Not to exceed 10%		
EU#18	Metal	Opacity	Not to exceed 20% [2]		310 CMR 7.06(1)(b)
		PM	98% baghouse control efficiency		Differential pressure range shall be between 2-10 inches

Table 3 Notes:

[1]Not to exceed No. 1 of the Chart for a period or aggregate period of time in excess of 6 minutes during any one hour provided that at no time during the said six minutes shall the shade, density or appearance be equal to or greater than No. 2 of the Chart.

[2]Not to exceed 20% opacity for a period or aggregate period of time in excess of 2 minutes during any one hour provided that, at no time during the said two minutes shall the opacity exceed 40%.

[3] The Torit cartridge system was replaced with a Micropul baghouse in 2006

B. COMPLIANCE DEMONSTRATION

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

Table 4

EU#	Monitoring/Testing Requirements
EU# 1,2,8,9, 14	1) Inspect and maintain the emission units in accordance with the manufacturer's recommendations and test for efficient operation at least once each calendar year in accordance with 310 CMR 7.04(4)(a).
EU#3,4,16	2) In accordance with the W063510 and 310 CMR 7.02(3)(n), the ESPs shall be maintained in proper operating condition. In accordance with 310 CMR 7.00:Appendix C (9)(b) maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the ESPs and the associated cell cleaning equipment. 3) In accordance with 310 CMR 7.00 Appendix C (9)(c), the conductivity lights and voltage meter shall be maintained according to manufacturer's specifications. 4) In accordance with W063510, observe the conductivity indicator lights at each ESP station once per day to verify that 75% of the lights are operating and indicating that a current is passing through the cell. 5) In accordance with the W063510, monitor the voltage at the ionizer and cell on a quarterly basis to verify that voltage is at least 10,000 volts at the ionizer and 6,500 volts at the cell.
EU#5 billet grinders	6) In accordance with the W063510 and 310 CMR 7.02(3)(n), the baghouse serving the billet grinders shall be maintained in proper operating condition. 7) In accordance with 310 CMR 7.00 Appendix C (9)(c), maintain the differential pressure gauge or the fine particle flow/emission monitor and alarm on the baghouse. According to the standard operating procedures (amended May 5, 2006), the baghouse operates at a pressure differential between 0-10 inches water (w.c.). The monitor shall comply with 40 CFR 60, Appendix F (Quality Control Procedures). 8) In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the baghouse. Preventative maintenance activities shall include a daily visual inspection of the baghouse outlet for opacity and of the differential pressure gauge, a weekly inspection of blowers, cleaning cycle, air dryer system cycling, pressure gauge settings, collection system, a semiannual PM is includes the weekly PM items, visible observation for visible dust on the clean side, solenoid valves, and preparation for seasonal changes. Records shall confirm the date of inspection and itemize the operating parameters examined. Records will remain on site.
EU#6	9) In accordance with W063510 and 310 CMR 7.02(3)(n), each of the nine (9) scrubbers shall be maintained in proper operating condition. 10) In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the scrubbers and the associated automatic pH adjusting system. Maintenance activities shall include an inspection of the media and water flow on a daily basis. Records shall include at a minimum; the date the inspection and/or maintenance was conducted, what actions were taken, date the pH probes are calibrated and cleaned, when scrubber media is replaced and shall itemize all the operating parameters examined. 11) In accordance with W003949, maintain the static pressure gauge in the plenum house in proper operating condition. In accordance with W122581, maintain the static pressure at the plenum house between 1 ¼ inches and 5 inches of water. Record the static pressure at least once every shift. 12) In accordance with W003949, maintain the pH of the recirculated water between 6-9. Continually monitor and record the pH of the recirculated scrubbing water. The pH probes shall be calibrated quarterly and check daily.

Table 4

EU#	Monitoring/Testing Requirements
	13) Pursuant to TR# 86002, for each scrubber maintain daily records of scrubber use and hours of operation.
#7 grit blasting	14) In accordance with W006130 and 310 CMR 7.02(3)(n), the baghouse shall be maintained in proper operating condition. 15) In accordance with 310 CMR 7.00: Appendix C (9)(c), the pressure differential gauge shall be maintained according to manufacturer's specifications and continually monitor the pressure drop across the baghouse. In accordance with W122581, maintain the operating pressure differential between 2-10 inches of water (w.c.). The monitor shall comply with 40 CFR 60, Appendix F (Quality Control Procedures). 16) In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the baghouse. Preventative maintenance activities shall include an inspection of the baghouse on a monthly basis and collection container on a weekly basis. Records shall confirm the date of inspection and itemize the operating parameters examined.
EU#10 grinder	17) In accordance with the Operating Permit Application and 310 CMR 7.02(3)(n), the baghouses and cyclones shall be maintained in proper operating condition. 18) In accordance with 310 CMR 7.00: Appendix C (9)(c), the static pressure gauge shall be maintained according to manufacturer's specifications and continually monitor the static pressure at the cyclones and baghouses. In accordance with CM-75-IF-014, the cyclones shall operate at 3" water static pressure. The baghouse shall operate at a static pressure differential between 2 - 10 inches of water. 19) In accordance with 310 CMR 7.00: Appendix C (9)(b) and 40 CFR 70.6 (a)(3), maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the baghouse and cyclone. Preventative maintenance activities shall include an inspection of the baghouse and cyclone on a monthly basis and baghouse collection container on a weekly basis. Records shall confirm the date of inspection and itemize the operating parameters examined.
EU#12, 13	20). In accordance with the Operating Permit Application and 310 CMR 7.02(3)(n), the particulate control equipment shall be maintained in proper operating condition. 21). In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the cartridge filters. Preventative maintenance activities shall include an inspection of the control equipment on a monthly basis and particulate collection container on a weekly basis. Records shall confirm the date of inspection and itemize the operating parameters examined. 22). In accordance with W122581 and standard operating procedure the baghouse serving the stockcutting (EU#12) shall operate at a pressure differential between 3- 10 inches of water 23). In accordance with the standard operating procedure the cartridge collector serving the Wheelabrator (EU#13) shall operate at a pressure differential between 2-10 inches of water.
EU #15	24) In accordance with 310 CMR 7.24(3)(f), install, maintain and properly operate a Stage I vapor recovery system. 25) In accordance with 310 CMR 7.24(6)(b) and (c) install, maintain, properly operate and test a certified Stage II vapor recovery collection and control system. 26) In accordance with 310 CMR 7.24(6) (c)(3), perform an in- use compliance test.
EU #17	27) In accordance with W008396 and 310 CMR 7.02(3)(n), the particulate control equipment shall be maintained in proper operating condition. 28) In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the baghouse. Preventative maintenance activities shall include an inspection of the control equipment on a weekly basis and particulate collection container

Table 4

EU#	Monitoring/Testing Requirements
	on a daily basis. Records shall confirm the date of inspection and itemize the operating parameters examined. 29) In accordance with W008396, maintain the differential pressure gauge in proper operating condition. 30) In accordance with #TR W122581 (minor modification), maintain the differential pressure across the baghouse between 2-10 inches water (w.c.). 31) In accordance with W008396, manually record the differential pressure across the baghouse once per day.
EU# 18	32) In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain records of design specifications and required operation and maintenance procedures to assure proper operation of the baghouse. Preventative maintenance activities shall include an inspection of the control equipment on a weekly basis and particulate collection container on a daily basis. Records shall confirm the date of inspection and itemize the operating parameters examined. 33) In accordance with the standard operating procedure the baghouse serving the Wheelabrator 4885 shall operate at a pressure differential between 2-10 inches of water.
Facility Wide	34) Conduct emission testing in accordance with 310 CMR 7.13(1), to demonstrate compliance with the Emission Limits specified in Table 3 and when the Department has determined that such stack testing is necessary to determine compliance with the Department's regulations or design provisos. Testing shall be in accordance with EPA approved reference test methods unless otherwise approved by EPA and the Department or unless otherwise specified and shall include test Methods 1 through 4 and for Particulate Matter (Method 3), Sulfur Dioxide (Method 6C), Nitrogen Oxides (Method 7E), Carbon Monoxide (Method 10), Gaseous Organic Compounds (Method 18), Total Gaseous Organic Concentration (Method 25A), Hydrogen Chloride (Method 26A), Metals (Method 29). Such stack testing shall be conducted: (a) by a person knowledgeable in stack testing, (b) in accordance with procedures contained in a test protocol which has been approved by the Department, and (c) in the presence of a representative of the Department when deemed necessary. Compliance with the allowable smoke and opacity limits shall be determined in accordance with EPA Method 9, as specified in 40 CFR 60, Appendix A in accordance with 310 CMR 7:00 Appendix C (9)(b). 35) Monitor the operations of the entire facility such that necessary information is available for the preparation of the annual Source Registration/Emission Statement Forms as required by 310 CMR 7.12. 36) In accordance with 310 CMR 7:00: Appendix C (9)(b) visually monitor the emission units and associated control equipment for visible emissions on a daily basis while the equipment is in operation.

TABLE 4A
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Unit # 6 scrubber control for Nitrogen Oxides & Particulate

Indicator	Differential Pressure	Opacity	Liquid Flow Meter	Static Pressure across the Plenum	pH of Scrubbing Water	Inspection /Maintenance
Measurement approach	The pressure of each scrubber is continuously monitored with a differential pressure transmitter (magnehelic). The results are displayed on the device control panel. Differential pressure readings are an indicator of when the scrubber media needs replacement.	Daily visible emissions observation by certified employees using EPA Method 9.	Make-up water flow rate to each scrubber is monitored by a rotometer and a nozzle pressure sensing gauge.	The pressure of each scrubber is continuously monitored with a static pressure gauge (manometer). The results are displayed on the device control panel.	The pH of the recirculated scrubbing water is monitored with pH probes. Results are continuously displayed on the device control panel.	Visual inspections and maintenance shall be performed according to the O/M checklist that shall include inspection of the scrubber inlet and outlet for water flow. Daily inspections shall include but not be limited to scrubber media, caustic line strainers, blowers, scrubber sumps, water flow and the automatic pH adjusting system. Maintenance is performed as needed.
Indicator range	The indicator range is a differential pressure reading between 2 and 10 inches of water column. An excursion triggers an alarm, inspection, corrective action and reporting requirement	The indicator is $\leq$ 20% opacity. Excursion of > 20% triggers an inspection, corrective action and reporting requirements	The make-up water flow rate range is 5-25 gpm. The nozzle water pressure is a minimum of 9 psig. An excursion triggers an inspection, corrective action and reporting requirements	The indicator range is a static pressure reading between 1.25 and 5 inches of water column. An excursion triggers an inspection, corrective action and reporting requirements	The indicator range is between pH 6 and 9. An excursion triggers an inspection, corrective action and reporting requirements.	Failure to perform an inspection triggers a reporting requirement. Equipment failures identified during the inspection trigger corrective action.

TABLE 4A
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Unit # 6 scrubber control for Nitrogen Oxides & Particulate

Indicator	Differential Pressure	Opacity	Liquid Flow Meter	Static Pressure across the Plenum	pH of Scrubbing Water	Inspection /Maintenance
Performance criteria	The alarm sounds when the measurements are outside of the indictor range.	Qualified personnel that maintain EPA Method 9 visible emissions certification shall perform inspections.	The alarm is triggered when the pressure sensor indicates pressure below minimum of 9 psig. The makeup water flow is monitored by the first shift treatment plant operator and recorded once during the first shift in a logbook located near the equipment.	The alarm sounds when the measurements are outside of the indictor range.	An alarm sounds when the measurements are outside of the indictor range -The probes are calibrated quarterly -pH is continuously monitored and logged -pH probes are cleaned weekly.	Inspections shall be performed by qualified personnel. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and or maintenance was conducted, what actions were taken, when scrubber media is replaced, when probes are calibrated and cleaned. The make-up and caustic line strainers shall be cleaned weekly.

TABLE 4B
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Units # 3 and 4 Particulate Matter (PM) Control at the ESP

Indicator	Voltage, current	Opacity	Conductivity	Inspection /Maintenance
Measurement approach	Current & voltage are monitored once per quarter using a voltmeter taking readings at the ionizer and the cell.	Daily visible emissions observation by certified employees using EPA Method 9	An indicator light is located at each of the units. Conductivity indicator light on demonstrates that there is current. When the light is off there is no current passing through the unit. A qualified employee monitors daily.	Daily Visual inspections and maintenance shall be performed according to the O/M checklist. Maintenance is performed as needed.
Indicator range	The indicator range is above or below 11,000 volts at the ionizer and above or below 6,500 volts at the cell. Excursion triggers an inspection, corrective action and reporting requirements.	The indicator is $\leq$ 20% opacity. Excursion of > 20% triggers an inspection, corrective action and reporting requirements	The indicator is less than 75 % of the lights on. An excursion triggers an inspection, corrective action and reporting requirements.	Failure to perform an inspection triggers a reporting requirement. Equipment failures identified during the inspection trigger corrective action.

TABLE 4B
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Units # 3 and 4 Particulate Matter (PM) Control at the ESP

Indicator	Voltage, current	Opacity	Conductivity	Inspection /Maintenance
Performance criteria	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel that maintain EPA Method 9 visible emissions certification shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed to manufacturer's recommendations. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and or maintenance was conducted and what actions were taken.

TABLE 4C
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Unit # 5 Particulate Matter (PM) Control at the Baghouse for Billet Grinders # 5950 & 5951

Indicator	Differential Pressure	Opacity	Inspection /Maintenance
Measurement approach	The pressure is monitored with a differential pressure gauge at the inlet and the outlet of the baghouse. Daily during each shift the value is monitored and recorded.	Daily visible emissions observation by certified employees using EPA Method 9.	Daily Visual inspections and maintenance shall be performed according to the O/M checklist. Maintenance is performed as needed.
Indicator range	The indicator range is 0-10 inches of water (W.C.). Excursion triggers an inspection, corrective action and reporting requirements	The indicator is $\leq$ 5% opacity. Excursion of is > 5%opacity triggers an inspection, corrective action and reporting requirements	Failure to perform an inspection triggers a reporting requirement. Equipment failures identified during the inspection trigger corrective action.

TABLE 4C
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Unit # 5 Particulate Matter (PM) Control at the Baghouse for Billet Grinders # 5950 & 5951

Indicator	Differential Pressure	Opacity	Inspection /Maintenance
Performance criteria	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel that maintain EPA Method 9 visible emissions certification shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and maintenance was conducted, what actions were taken.	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and or maintenance was conducted and what actions were taken.

TABLE 4D
Compliance Assurance Monitoring (Cam) – 40 CFR 64
Emission Unit # 17 Particulate Matter (PM) Control at the Baghouse for Pac- Hot Flash Burning

Indicator	Differential Pressure Across Baghouse	Opacity	Inspection /Maintenance
Measurement approa	The pressure is monitored with a differential pressure gauge at the inlet and the outlet of the baghouse. Daily during each shift the value is monitored and recorded.	Daily visible emissions observation by certified employees using EPA Method 9.	Daily Visual inspections and maintenance shall be performed according to the O/M checklist. Maintenance is performed as needed.
Indicator range	The indicator range is 2-10 inches of water (W.C.). Excursion triggers an inspection, corrective action and reporting requirements	The indicator is $\leq$ 10 % Opacity. Excursion of > 10% opacity triggers an inspection, corrective action and reporting requirements	Failure to perform an inspection triggers a reporting requirement. Equipment failures identified during the inspection trigger corrective action.
Performance Criteria	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel that maintain EPA Method 9 visible emissions certification shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a Logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and or maintenance was conducted and what actions were taken.

TABLE 4E
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Unit # 13 (part of) Particulate Matter (PM) Cartridge Collector Control at the Wheelabrator

Indicator	Indicator #1 Differential Pressure across filter	Indicator #2 Opacity	Inspection /Maintenance
Measurement approach	The pressure is monitored with a differential pressure gauge at the inlet and the outlet of the baghouse. Daily during each shift the value is monitored and recorded.	Daily visible emissions observation by certified employees using EPA Method 9.	Daily Visual inspections and maintenance shall be performed according to the O/M checklist. Maintenance is performed as needed.
Indicator Range	The indicator range is 2-10 inches of water (W.C.) Excursion triggers an inspection, corrective action and reporting requirements	The indicator is $\leq$ 10 % opacity. Excursion of > 10% opacity triggers and inspection, corrective action and reporting requirements.	Failure to perform an inspection triggers a reporting requirement. Equipment failures identified during the inspection trigger corrective action.
Performance Criteria	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel that maintain EPA Method 9 visible emissions certification shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and or maintenance was conducted and what actions were taken.

TABLE 4F
Compliance Assurance Monitoring (CAM) – 40 CFR 64
Emission Unit # 18 Particulate Matter (PM) control at the Wheelabrator 4885

Indicator	Indicator #1 Differential Pressure across filter	Indicator #2 Opacity	Inspection /Maintenance
Measurement approach	The pressure is monitored with a differential pressure gauge at the inlet and the outlet of the baghouse. Daily during each shift the value is monitored and recorded.	Daily visible emissions observation by certified employees using EPA Method 9.	Daily Visual inspections and maintenance shall be performed according to the O/M checklist. Maintenance is performed as needed.
Indicator Range	The indicator range is 2-10 inches of water (W.C.) Excursion triggers an inspection, corrective action and reporting requirements	The indicator is $\leq$ 20 % opacity. Excursion of > 20% opacity triggers an inspection, corrective action and reporting requirements.	Failure to perform an inspection triggers a reporting requirement. Equipment failures identified during the inspection trigger corrective action.
Performance Criteria	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist.	Qualified personnel that maintain EPA Method 9 visible emissions certification shall perform inspections.	Qualified personnel shall perform inspections. Inspections and maintenance shall be performed according to O/M checklist.

	Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Inspections and maintenance shall be performed according to O/M checklist. Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and /or maintenance was conducted, what actions were taken.	Maintenance performed as needed. Results shall be recorded in a logbook. Records shall include at a minimum the date the inspection and or maintenance was conducted and what actions were taken.

Table 5

EU#	Record Keeping Requirements
EU #1,2,8,9,14	1) In accordance with 310 CMR 7.04(4), record the results of the inspection, maintenance and testing and the date upon which it was performed on the fossil fuel burning equipment and post on or near the equipment.
EU# 3,4,6,16	2) In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain a record of required operating and maintenance procedures to assure the proper operation of the control equipment (ESPs and scrubbers). Maintain a record of all malfunctions including at a minimum the date and time the malfunction occurred, a description of the malfunction and the corrective actions taken, the date the corrective actions were initiated and completed and when the facility returned to compliance.
EU#5	3) In accordance with #W063510 maintain records identifying the date and time of any alarm trips on the baghouses, name of the person responding to the alarm, date, time and description of the corrective action taken.
EU# 8, 9,14	4) In accordance with transmittal #126883, #W003111 and # W003112 maintain fuel usage logs, a record of routine maintenance activities, including, at a minimum, the type or description of the maintenance performed and the date and time the work was completed, and a record of all malfunctions including at a minimum the date and time the malfunction occurred, a description of the malfunction and the corrective action taken, the date and time the corrective actions were initiated, and the date and time corrective action was completed and the facility returned to compliance.
EU #11	5) In accordance with 310 CMR 7.18(8)(f) and 7.03(6), maintain records sufficient to demonstrate compliance. Said records shall include at a minimum, the following; (a) identity, quantity, formulation and density of the solvent used; (b) quantity, formulation and density of all waste solvent generated, and; (c) actual operational and any appurtenant emission capture and control equipment.
EU# 15	6) In accordance with 310 CMR 7.24(3)(f), maintain records of the following: a. all maintenance performed, including the type of maintenance performed and the date it was performed; b. all malfunctions, including the type of malfunction, the date the malfunction was observed and repaired; c. maintain records of the daily throughput of any organic material with a true vapor pressure of 1.5 psia or greater under actual storage conditions.
EU#17 & 18	7) In accordance with 310 CMR 7.00: Appendix C (9)(b), maintain a record of required operating and maintenance procedures to assure the proper operation of the baghouse. Maintain a record of all malfunctions including at a minimum the date and time the malfunction occurred, a description of the malfunction and the corrective actions taken, the date the corrective actions were initiated and completed and when the facility returned to compliance. 8)In accordance with W063510 and the SOMP for EU#18, emission calculations and records sufficient to verify that yearly PM emissions have not exceeded emission limits identified in Table 3 shall be maintained on site.
Facility Wide	9) Maintain on site the following records for five (5) years from the date of generation and have the records readily available to the Department and EPA personnel in accordance with 310 CMR 7.00: Appendix C (10)(b): a. inspection, maintenance, and testing results of the emission unit and the date upon which it was performed in accordance with 310 CMR 7.04(4)(a); b. records of emissions testing conducted to demonstrate compliance with the applicable requirements in Table 3 in accordance with 310 CMR 7.13(1)(d), c. all monitoring data and supporting information required by this Operating Permit on site for five (5) years from the date of the monitoring sample, measurement, report or initial operating pplication,

Table 5

EU#	Record Keeping Requirements
	d. maintain records for the annual preparation of a Source Registration/Emission Statement Form, in accordance with 310 CMR 7.12. 10) Keep copies of Source registration/ Emission Statement Forms submitted annually to the Department as required per 310 CMR 7.12(3). 11) Maintain records of any EPA Test Method 9 opacity determinations performed according to 40 CFR 60, Appendix A, including detached plumes, required by the Department or EPA. 12) In accordance with 310 CMR 7.00 Appendix C (9)(b) record the following information in a logbook on a monthly basis. Control and monitoring equipment malfunctions, upsets, repairs, maintenance and any other deviation from equipment design parameters.

Table 6

EU#	Reporting Requirements
EU#6	1) In accordance with # W003949, submit a report to the Department when there is an exceedance of the short or long term NOx emissions identified in Table 3.
Facility Wide	2) Summarize and submit to the Department the results of stack testing as prescribed in the Department's approved pretest protocol for stack testing that was determined by the Department to be necessary to ascertain compliance with Department's regulations or design approval provisos in accordance with 310 CMR 7.13(1) and 310 CMR 7.13(2). 3) Upon the Department's request, any records required by the applicable requirements identified in Section 4 of the operating permit, or the emissions of any air contaminant from the facility, shall be submitted to the Department within 30 days of the request by the Department, or within a longer time period if approved in writing by the Department. Said response shall be transmitted on paper, on computer disk, or electronically at the discretion of the Department, pursuant to 310 CMR 7.00: Appendix C (10)(a) incorporated herein by reference. 4) Submit a Source Registration/Emission Statement form to the Department on an annual basis as required by 310 CMR 7.12(2). Any construction, substantial reconstruction or alteration as described in 310 CMR 7.02(2), at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to the Department on the next required source registration/emissions statement. 5) Submit by January 30 and July 30 a summary of all monitoring data and related supporting information to the Department as required by 310 CMR 7.00: Appendix C (10)(c) for the previous six months respectively. 6) A responsible official of the Permittee as provided in 310 CMR 7.00 must certify all required reports as required by 310 CMR 7.00: Appendix C (10)(h). 7) Promptly report to the Department all instances of deviations from Operating Permit requirements (including but not limited to, emission limitations/standards, inoperable smoke sensing equipment, malfunctioning air pollution control equipment) by telephone or fax, within three days of discovery of such deviation, as provided in 310 CMR 7.00: Appendix C (10)(f). 8) Updated versions of the Standard Operating and Maintenance Procedures (SOMP) shall be submitted to the Department. The Department must approve of significant changes to the SOMP prior to the change becoming effective. The updated SOMP shall supersede prior versions of the SOMP.

C. GENERAL APPLICABLE REQUIREMENTS

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

D. REQUIREMENTS NOT CURRENTLY APPLICABLE

The Permittee is currently not subject to the following requirements:

Table 7

Regulation	Description
310 CMR 7.25	Consumer and Commercial Products
42 U.S.C. 7401, §112	Hazardous Air Pollutants
42 U.S.C. 7401, §112(r)	Accidental Release Prevention Requirements: Risk Management under Clean Air Act 112(r)(7),

5. SPECIAL TERMS AND CONDITIONS

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

Table 8

Special Terms And Conditions
The Permittee is subject to, and has stated in their Operating Permit application, TR# W063510 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.
The Permittee has indicated that it is subject to and complying with the requirements of 310 CMR 7.16, Reduction of Single Occupant Commuter Vehicle Use.
The Permitee operates several parts cleaners at the North Grafton facility. The units vary from dunk tanks to spray units. The units must conform to the design, operation and maintenance requirements listed in 310 CMR 7.18(8).
In accordance with 310 CMR 7.18(8), all solvents shall be handled and managed so that evaporation to the atmosphere is minimized.

6. ALTERNATIVE OPERATING SCENARIOS

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

7. EMISSIONS TRADING

A. Intra-Facility Emission Trading

The Permittee did not request intra-facility emissions trading in its operating permit application.

Pursuant to 310 CMR 7.00: Appendix C (7)(b), emission trades, provided for in this permit, may be implemented provided the Permittee notifies The United States Environmental Protection Agency (EPA) and the Department at least fifteen (15) days in advance of the proposed changes and the Permittee provides the information required in 310 CMR 7.00: Appendix C (7)(b) 3.

Any intra-facility change that does not qualify pursuant to 310 CMR 7.00: Appendix C (7)(b) 2. is required to be submitted to the Department pursuant to 310 CMR 7.00: Appendix B.

B. Inter-Facility Emission Trading

The Permittee did not request inter-facility emissions trading in its operating permit application.

All increases in emissions due to emission trading, must be authorized under the applicable requirements of 310 CMR 7.00: Appendix B (the "Emissions Trading Program") and the 42 U.S.C. §7401 et seq. (the "Act"), and provided for in this permit.

8. COMPLIANCE SCHEDULE

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

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

GENERAL CONDITIONS FOR OPERATING PERMIT

9. FEES

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

10. COMPLIANCE CERTIFICATION

All documents submitted to the Department 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 Permitee via the Department's web site, http://www.mass.gov/dep/air/approvals/aqforms.htm.

A. Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 to the Department 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 Operating Permit that are the basis of the certification;
2) the current compliance status and whether compliance was continuous or intermittent during the reporting period;
3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
4) any additional information required by the Department to determine the compliance status of the source.

B. Semi-Annual Monitoring Summary Report and Certification

The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 and July 30 to the Department. 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 Operating 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 Department to determine the compliance status of the source.

11. NONCOMPLIANCE

Any noncompliance with a Operating Permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act and is grounds for enforcement action, for Operating Permit termination or revocation; or for denial of an operating permit renewal application by the Department 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 Operating Permit does not relieve the Permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this permit.

12. PERMIT SHIELD

A. This facility has a permit shield provided that it operates in compliance with the terms and conditions of this permit. Compliance with the terms and conditions of this Operating 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 Operating Permit and any earlier permit, the terms and conditions of this Operating Permit control.

B. The Department has determined that the Permittee is not currently subject to the requirements listed in Section 4, Table 7.

C. Nothing in this Operating Permit shall alter or affect the following:

1) the liability of the source for any violation of applicable requirement prior to or at the time of Operating Permit issuance,
2) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
3) the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Act.

13. ENFORCEMENT

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.02(8)(i), 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22 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 Department, EPA and citizens as defined under the Act.

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

14. PERMIT TERM

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

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

15. PERMIT RENEWAL

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

In the event the Department has not taken final action on the operating permit renewal application prior to this permit's expiration date, this Operating Permit shall remain in effect until the Department takes final action on the renewal

application, provided that a timely and complete renewal application has been submitted in accordance with 310 CMR 7.00: Appendix C (13).

16. REOPENING FOR CAUSE

This Operating Permit may be modified, revoked, reopened, and reissued, or terminated for cause by the Department and/or EPA. The responsible official of the facility may request that the Department terminate the facility's operating permit for cause. The Department will reopen and amend this Operating 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 Department'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 Department copies of records that the Permittee is required to retain by this permit.

18. DUTY TO SUPPLEMENT

The Permittee, upon becoming aware that any relevant facts were omitted or that incorrect information was submitted in the Operating 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 Department a material error or omission in any records, reports, plans, or other documents previously provided to the Department.

19. TRANSFER OF OWNERSHIP OR OPERATION

This Operating 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 Operating Permit amendment if no other change in the Operating Permit is necessary and provided that a written agreement containing a specific date for transfer of Operating Permit responsibility, coverage, liability between current and new Permittee has been submitted to the Department.

20. PROPERTY RIGHTS

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

21. INSPECTION AND ENTRY

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Department and EPA to perform the following as per 310 CMR 7.00: Appendix C (3)(g) 12:

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.

22. PERMIT AVAILABILITY

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

23. SEVERABILITY CLAUSE

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

24. EMERGENCY CONDITIONS

The Permittee shall be shielded from enforcement action brought for noncompliance with technology based[1] emission limitations specified in this Operating Permit as a result of an emergency[2]. 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 Department 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.

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

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

25. PERMIT DEVIATION

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

The Permittee shall report to the Department's Regional Bureau of Waste Prevention the following deviations from Operating Permit requirements, by telephone or fax, within three (3) days of discovery of such deviation:

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

B. Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the Operating Permit or approval as surrogate for an emission limit.

C. Exceedances of Operating 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 Massachusetts Department of Environmental Protection Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available to the Permitee via the Department's web site, http://www.mass.gov/dep/air/approvals/aqforms.htm. This report shall include the deviation, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone or fax within 3 days of discovery, said deviations shall also be submitted in writing 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 Department written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C (5)(h) and (i). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C (7)(a) and will be appended to the facility's permit. The permit shield allowed for at 310 CMR 7.00: Appendix C (12) shall not apply to these changes.

27. MODIFICATIONS

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

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

C. Significant Modifications - The Permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C (8)(a) 3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C (8)(c).

D. No Operating 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 Operating Permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Act, provided that such increases do not require an operating permit revision under any other applicable requirement.

APPEAL CONDITIONS FOR OPERATING PERMIT

This Operating Permit is an action of the Department. 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 Department'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 Operating Permit is not consistent with applicable laws and regulations.

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

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

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

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

The Department 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.

28. LEGEND OF ABBREVIATED TERMS IN OPERATING PERMIT

*Not all abbreviations are present in every Operating Permit

< - Less Than
> - Greater Than
#/hr - Pounds Per Hour

10^6 BTU/hr - 1,000,000 BTU Per Hour

AQCR - Air Quality Control Region

CEM - Continuous Emission Monitor

CO - Carbon Monoxide

DSCF- Dry Standard Cubic Foot

EPA - Environmental Protection Agency

FMF FAC. NO. - Facility Master File Number

FMF RO NO. - Facility Master File Regulated Object Number

FT^3/day - Cubic Feet Per Day

HHV - Higher Heating Value

ISO - Represent 5̃9F, 60% Relative Humidity, 29.92 Inches Mercury At Sea Level

MADEP - Massachusetts Department of Environmental Protection

MMBTU/hr - Million British Thermal Units Per Hour

NH3 - Ammonia

NOx - Nitrogen Oxides

PB - Lead

PLT ID - Plant Identification

PM - Particulate Matter

PPM - Parts Per Million

PTE - Potential To Emit

SO2 - Sulfur Dioxide

SSEIS - Stationary Source Emission Inventory System

TPY - Tons Per Year

VOC - Volatile Organic Compounds

W.C.- water column