



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

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

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## 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"]:**

Hazen Paper Company  
240 South Water Street  
Holyoke, MA 01040

**INFORMATION RELIED UPON:**

Application No. 22-AQ14-005-REN  
ePlace Authorization No. AQ14-0000009  
Approval No. WE-22-006

**FACILITY LOCATION:**

Hazen Paper Company  
240 South Water Street  
Holyoke, MA 01040

**FACILITY IDENTIFYING NUMBERS:**

AQ ID: 042/0128  
FMF FAC NO.: 130878  
FMF RO NO.: 50073

**NATURE OF BUSINESS:**

Paper & Allied Products

Standard Industrial Classification (SIC): 2672  
North American Industrial Classification System  
(NAICS): 322222

**RESPONSIBLE OFFICIAL:**

Name: John H. Hazen  
Title: President

**FACILITY CONTACT PERSON:**

Name: Gail Calvanese  
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**This Operating Permit shall expire on August 7, 2028.**

For the Department of Environmental Protection

Michael Gorski  
Regional Director  
Department of Environmental Protection  
Western Regional Office

August 7, 2023

Date

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.  
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## TABLE OF CONTENTS

Section	Special Conditions for Operating Permit	Page No.
1	Permitted Activities and Description of Facility and Operations	3
2	Emission Unit Identification – Table 1	5
3	Identification of Exempt Activities – Table 2	6
4	Applicable Requirements	
	A. Operational and/or Production Emission Limits and Restrictions – Table 3	7
	B. Compliance Demonstration	
	- Monitoring and Testing Requirements – Table 4	11
	- Record Keeping Requirements - Table 5	13
	- Reporting Requirements – Table 6	16
	C. General Applicable Requirements	17
	D. Requirements Not Currently Applicable -Table 7	17
5	Special Terms and Conditions – Table 8	18
6	Alternative Operating Scenarios – Table 9	21
7	Emissions Trading – Table 10	21
8	Compliance Schedule	21
Section	General Conditions for Operating Permit	
9	Fees	22
10	Compliance Certification	22
11	Noncompliance	23
12	Permit Shield	23
13	Enforcement	24
14	Permit Term	24
15	Permit Renewal	24
16	Reopening for Cause	25
17	Duty to Provide Information	25
18	Duty to Supplement	25
19	Transfer of Ownership or Operation	25
20	Property Rights	26
21	Inspection and Entry	26
22	Permit Availability	26
23	Severability Clause	26
24	Emergency Conditions	26
25	Permit Deviation	27
26	Operational Flexibility	28
27	Modifications	28
28	Ozone Depleting Substances	29
Section	Appeal Conditions for Operating Permit	30

## **SPECIAL CONDITIONS FOR OPERATING PERMIT**

### **1. PERMITTED ACTIVITIES**

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

#### **A. DESCRIPTION OF FACILITY AND OPERATIONS**

The Hazen Paper Company is a paper converter specializing in film and foil laminations, gravure printing, specialty coating, and rotary embossing. The facility consists of one (1) laminator, three (3) laminator-gravure coaters, three (3) printer gravure coaters, two small boilers, several cold cleaning degreasers, and a stationary coating mix tank. The primary control device is a REECO regenerative thermal oxidizer. Hazen paper company operates under a Compliance Assurance Monitoring (“CAM”) plan dated April 28, 2022 conforming to the requirements of 40 CFR Part 64, and which is incorporated into the Renewal Operating Permit. Hazen keeps records of HAP emissions to demonstrate non-major source applicability with the requirements of 40 CFR Part 63 Subpart KK MACT standards.

The facility is considered to be a major source of volatile organic compounds (“VOC”) because the facility has the potential to emit greater than 50 tons per year of VOC. Therefore the facility is subject to the Operating Permit and Compliance Program pursuant to 310 CMR 7.00: Appendix C(2).

The Cleaver Brooks 6.3MMBtu/hr and Hurst 100HP 4.2MMBtu/hr boilers are not subject to 40 CFR 63 Subpart JJJJJ – National Emissions Standards for Hazardous Air Pollutants (“NESHAP”) for Industrial, Commercial, and Institutional Boilers Area Sources, because natural gas is the main fuel, and the unit meets the definition of a gas-fired boiler per §63.11237 of this subpart.

The facility is subject to 40 CFR 63 Subpart KK – National Emission Standards for Hazardous Air Pollutants (“NESHAPS”) for the Printing and Publishing Industry. The facility is not a major source for Hazardous Air Pollutant (“HAPS”) since the facility potential to emit is less than major and has never had HAP emissions greater than major. The facility meets the requirements of an area source because the facility has committed to and meets the criteria of §63.820(a)(2)(i) and (ii) to use less than 10 tons per rolling 12-month period of each individual HAP and less than 25 tons per rolling 12-month period of any combination of HAP at the facility including materials used for source categories or purposes other than printing and publishing. Therefore, it is subject only to the record keeping and reporting requirements of Subpart KK in accordance with §63.820(a)(3).

The No. 1 Laminator (EU 1) and Laminator-Gravure Coater No. 2 (EU 2) have been removed from add-on pollution control equipment and only use water-based coatings with VOC contents less than 0.40 pounds of VOC per pound of solids (lbs VOC/lb solid) applied as allowed under 310 CMR 7.18(14)(d)2(b)(i).

Laminator-Gravure Coater No. 3 (EU 3) has also been removed from add-on pollution control equipment. Since this unit only has the potential to emit (PTE) of 20 tons per year it is exempt from the requirements of 310 CMR 7.18(14)(a)2 as per 310 CMR 7.18(14)(b) which exempts units with a PTE of less than 25 tons per

year. Printer-Gravure Coater No. 5 (EU 6), with a PTE of 10 tons per year, is also exempt from the requirements 310 CMR 7.18(14) per 310 CMR 7.18(14)(b).

Laminator-Gravure Coater No. 4 (EU 4) has a potential to emit of 40 tons per year and complies with the requirements of 310 CMR 7.18(14) by utilizing a catalytic oxidizer, rated at 95% efficiency, as an add on control. However, the No. 4 Laminator-Gravure Coater does bypass the catalytic oxidizer when utilizing water-based coatings that meet the highest VOC content coating requirement of 0.4 lbs VOC/ lb solid applied under 310 CMR 7.18(14)(d)2(b)(i). Over the past several years the VOC content of the coatings used when bypassing the control device was less than 0.40 lbs VOC/lb Solids.

The remaining two Printer-Gravure Coaters Nos. 3 and 6 (EU 5 & EU6) vent only to the 99% efficient REECO Thermal Oxidizer and meet 310 CMR 7.18(14) RACT requirements by complying with 310 CMR 7.18(14)(d)2(b)(iii).

Eight existing above-ground 1,400-gallon VOC storage tanks constructed in 1986, which are listed as EU 7 in the facilities initial Operating Permit, are not subject to Plan Approval in accordance with 310 CMR 7.02(2)(b)11 as the tanks are less than 40,000 gallons and all VOC containing liquids have vapor pressures which are below 1.5 pounds per square inch (“psi”). The only compound stored in the tanks that has a vapor pressure above 1.5 psi is acetone, which is currently defined as an exempt VOC by Massachusetts and EPA. The tanks are also not subject to the NSPS requirements of 40 CFR 60 Subpart Kb - *Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which construction, substantial reconstruction, or modification commenced after July 23, 1984*. In accordance with §60.110b, this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (0.507psi) or with a capacity greater than or equal to 75 m<sup>3</sup> (19,812 gal) but less than 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure less than 15.0 kPa (2.176 psi).

#### **Massachusetts Greenhouse Gas Reporting Program**

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

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

“Greenhouse Gas” means any chemical or physical substance that is emitted into the air and that MassDEP may reasonably anticipate will cause or contribute to climate change including, but not limited to, CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub>, hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

Tables 3, 4, 5, 6, and 8 of this Operating Permit contain the air quality requirements and regulations to which Hazen Paper is subject. Non applicability determinations are contained in Table 7.

## 2. EMISSION UNIT IDENTIFICATION

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

<b>Table 1</b>			
<b>EU</b>	<b>Description of EU</b>	<b>EU Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU 1	No. 1 Laminator	≈ 500 feet per minute	none
EU 2	No. 2 Laminator-Gravure Coater	≈ 833 feet per minute	none
EU 3	No. 3 Laminator-Gravure Coater	≈ 666 feet per minute	none
EU 4	No. 4 Laminator-Gravure Coater	≈ 833 feet per minute	AP Catalytic Oxidizer
EU 5	No. 3 Printer-Gravure Coater	≈ 333 feet per minute	REECO Thermal Oxidizer
EU 6	No. 5 Printer-Gravure Coater	≈ 215 feet per minute	REECO Thermal Oxidizer
EU 9a	Boiler: Cleaver Brooks Model CB 2000-150	6.3 MMBtu/hr	none
EU 9b	Boiler: Hurst Model 100HP LPE	4.2 MMBtu/hr	none
EU 10	Cold cleaning degreaser/ parts washer	Various	none
EU 11	No. 6 Printer-Gravure Coater	≈ 750 feet per minute	REECO Thermal Oxidizer

### Table 1 Key

EU = Emission Unit  
 No. = number  
 HP = Horsepower

PCD = Pollution Control Device  
 MMBtu/hr = million British Thermal Units per hour  
 ≈ = approximately

### 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):

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

#### 4. APPLICABLE REQUIREMENTS

##### A. OPERATIONAL AND/OR PRODUCTION EMISSION LIMITS AND RESTRICTIONS

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

<b>Table 3</b>					
<b>EU</b>	<b>Operational and/or Production Limits</b>	<b>Fuel/Raw Material</b>	<b>Pollutant</b>	<b>Emissions Limits/Standards</b>	<b>Applicable Regulation and/or Approval No</b>
EU 1	Line Speed $\leq$ 500ft/min when coatings are $>$ 1.4lb VOC/GSA <sup>(2)</sup>	coatings & inks	VOC	$\leq$ 0.40 lb VOC/lb Solids Applied <sup>(2)</sup>	Regulation 310 CMR 7.18(14)(d)2(b) MassDEP Approval #1-P-95-062 (4/14/97)  MassDEP Approval 1-P-90-046 (8/31/90; amended 11/3/95)
EU 2	None	coatings & inks	VOC	$\leq$ 0.40 lb VOC/lb Solids Applied <sup>(1)</sup>	Regulation 310 CMR 7.18(14)(d)2(b)
EU 3	None	coatings & inks	VOC	$\leq$ 3.18 lb VOC/GSA <sup>(1)</sup> ; $\leq$ 20 tons/year <sup>(4)(11)</sup> ; $\leq$ 3333 lb VOC/calendar month	MassDEP Approval 1-P-88-030 (2/3/89) MassDEP Approval 1-P-94-066 (11/16/94)  Regulation 310 CMR 7.18(14)(b)
EU 4	$\geq$ 650 °F catalyst inlet temperature 100% Capture of Coating Emissions  if $<$ 0.40 lb VOC/lb Solids Applied <sup>(2)</sup> (before control), may vent to atmosphere	coatings & inks	VOC	$\leq$ 4.8 lb VOC/GSA <sup>(1)</sup> (after control) $\geq$ 95.0% VOC DE  $\leq$ 6933 lb/calendar month; $\leq$ 95.7 lb VOC/GSA (before control); $\leq$ 41.6 tons/year <sup>(4)(11)</sup>	MassDEP Approval 1-P-88-030 (2/3/89) Regulation 310 CMR 7.18(14)(d)2(a) Regulation 310 CMR 7.00 Appendix C(9)(b)2  MassDEP Approval 1-P-94-066 (11/16/94) Regulation 310 CMR 7.18(14)(d)2(b)
EU 5	REECO RTO $\geq$ 1400°F chamber temp. 100% Capture of Coating Emissions	coatings & inks	VOC	$\leq$ 4.8 lb VOC/GSA <sup>(1)</sup> (after control) REECO RTO $\geq$ 99.0% VOC DE <sup>(3)</sup>	Regulation 310 CMR 7.18(14)(d)2(a) MassDEP Approval 1-P-98-013 (6/16/98)
EU 6	REECO RTO $\geq$ 1400°F chamber temp. 100% Capture of Coating Emissions	coatings & inks	VOC	$\leq$ 4.8 lb VOC/GSA <sup>(1)</sup> (after control) REECO RTO $\geq$ 99.0% VOC DE <sup>(3)</sup>  $\leq$ 1666 lb/calendar month;	Regulation 310 CMR 7.18(14)(b) MassDEP Approval 1-P-98-013 (6/16/98) MassDEP Approval 1-P-88-030 (2/3/89)

**Table 3**

EU	Operational and/or Production Limits	Fuel/Raw Material	Pollutant	Emissions Limits/Standards	Applicable Regulation and/or Approval No
				≤10.0 tons/year <sup>(4)(11)</sup>	
EU 9a	To be exempt from the requirements of 40 CFR 63, Subpart JJJJJ, the boiler must burn liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel as defined in 40 CFR 63.11237. Periodic testing maintenance or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.	Natural gas & No. 2 fuel oil	PM <sup>(6)</sup>	0.10 lb/MMBtu <sup>(7)</sup>	MassDEP Approval PV-85-C-009 (8/27/85)
			Smoke	< No. 1 of Chart <sup>(8)</sup> , except No. 1 to < No. 2 of Chart for ≤ 6 minutes during any one hour	Regulation 310 CMR 7.06(1)(a)
		No. 2 fuel oil	Sulfur in fuel	≤0.0015% S on and after July 1, 2018	Regulation 310 CMR 7.05(1)(a)1
EU 9b	To be exempt from the requirements of 40 CFR 63, Subpart JJJJJ, the boiler must burn liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel as defined in 40 CFR 63.11237. Periodic testing maintenance or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.	Natural gas & No. 2 fuel oil	PM <sup>(6)</sup>	0.10 lb/MMBtu <sup>(7)</sup>	310 CMR 7.02(8)(h) Table 6
			Smoke	< No. 1 of Chart <sup>(8)</sup> , except No. 1 to < No. 2 of Chart for ≤ 6 minutes during any one hour	Regulation 310 CMR 7.06(1)(a)
		No. 2 fuel oil	Sulfur in fuel	≤0.0015% S on and after July 1, 2018	Regulation 310 CMR 7.05(1)(a)1
EU 10	Usage rate < 100 gallons per calendar month per degreaser	cleaning solvent	VOC <sup>(9)</sup>	Solvent Vapor Pressure ≤ 1.0 mm Hg at 20°C	Regulation 310 CMR 7.03(8) Regulation 310 CMR 7.18(1) Regulation 310 CMR 7.18(8)(a)
EU 11	REECO RTO ≥1400°F chamber temp.  If < 2.4 lb VOC/GSA <sup>(2)(5)</sup> (before control) and cleanup solution contains ≤ 15% VOC, may vent to atmosphere;  100% Capture of All Station Emissions	coatings & inks	VOC	≤ 4.8lb VOC/GSA <sup>(1)(5)</sup> (after control) REECO RTO ≥99.0% VOC DE <sup>(3)</sup> With >15% VOC cleanup solution must capture with 100% efficiency ≤ 9000 lb/calendar month; 23.5 tons/year <sup>(4)(11)</sup>	Regulation 310 CMR 7.18(14)(d)2(a) MassDEP Approval 1-P-95-062 (4/14/97) MassDEP Approval 1-P-98-013 (6/16/98)



**Table 3**

EU	Operational and/or Production Limits	Fuel/Raw Material	Pollutant	Emissions Limits/Standards	Applicable Regulation and/or Approval No
Facility-wide	All	various	Opacity	$\leq 20\%$ , except 20 to $\leq 40\%$ for $\leq 2$ minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
			HAPs	$\leq 9.9$ TPY <sup>(11)</sup> individual HAP $\leq 24.8$ TPY <sup>(11)</sup> combined HAPs	40 CFR 63.820(a)(2) MassDEP Approval WE-14-031; Tr. X259816 (11/09/2017)
			Greenhouse Gas <sup>(10)</sup>	NA	310 CMR 7.71 (State Only Requirement)

**Table 3 Key:**

VOC = Volatile Organic Compounds

PM = Total Filterable Particulate Matter

Opacity = the degree to which emissions reduce the transmission of light and obscure the view of an object in the background.

lb = pounds

lbs/MMBtu = pounds per Million British thermal units

lbs/hr = pounds per hour

TPY = tons per consecutive 12-month period

GSA = gallons of solids applied

RTO = regenerative thermal oxidizer

CMR = Code of Massachusetts Regulations

CFR = Code of Federal Regulations

> = greater than

$\geq$  = greater than or equal to

< = less than

$\leq$  = less than or equal to

°F = degrees Fahrenheit

% = percent

ft/min = feet per minute

DE = Destruction Efficiency

HAPs = Hazardous Air Pollutants

**Table 3 Foot Notes:**

(1) In accordance with 310 CMR 7.18(2)(a), a three-hour averaging time applies.

(2) In accordance with 310 CMR 7.18(2)(a), an instantaneous averaging time applies.

(3) At  $\geq 80\%$  of the maximum rated inlet VOC loading.

(4) Rolling 12-month total.

(5) Each coating station considered separately.

(6) Particulate matter as measured according to the applicable procedures specified in 40 CFR Part 60 Appendix A, Method 5.

(7) Based on a one-hour average.

(8) Chart means the Ringelmann Scale for grading the density of smoke, as published by the United States Bureau of Mines and as referred to in the Bureau of Mines Information Circular No. 8333, or any smoke inspection guide approved by MassDEP.

(9) Petroleum hydrocarbon (contains no halogens).

(10) Greenhouse Gas means any chemical or physical substance that is emitted into the air and that MassDEP may reasonably anticipate will cause or contribute to climate change including, but not limited to: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

(11) To calculate the amount of a consecutive 12 month rolling period take the current calendar month amount and add it to the previous 11 calendar months total amount.

**B. COMPLIANCE DEMONSTRATION**

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

<b>Table 4</b>	
<b>EU</b>	<b>Monitoring And Testing Requirements</b>
EU 4	1. In accordance with Regulation 310 CMR 7.18(2)(e), 310 CMR 7.00 Appendix C(9)(b)2., and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, continuously monitor the catalyst exhaust temperature (°F) and the temperature rise across the catalyst bed (°F).
	2. In accordance with 40 CFR 64.3 (CAM), the chamber temperature shall be monitored with a thermocouple. Accuracy of the thermocouple shall be verified by a second, or redundant, thermocouple probe inserted into the oxidizer chamber with a handheld meter. This validation check shall be conducted at least annually. The acceptance criterion is ± 15°F.
	3. In accordance with 40 CFR 64 and the facility's CAM Plan dated 04/28/2022, test the catalytic oxidizer temperature audible alarm and flashing strobe, if the temperature drops below the 700°F set-point, at least once per calendar year.
	4. In accordance with 40 CFR 64 and the facility's CAM Plan dated 04/28/2022, monitor at least once per calendar month the face velocity of each natural draft opening ("NDO") to ensure each is ≥ 200 feet per minute.
	5. In accordance with 40 CFR 64 and the facility's CAM Plan dated 04/28/2022, monitor at least once per calendar month by means of a checklist, provided in the CAM Plan, the physical parameters of the enclosure that are indicative of 100% capture efficient operation.
EU 5 EU 6	6. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, monitor at least once per week the face velocity at the base of the strip curtains to the Total Room Enclosure to ensure each is ≥ 200 feet per minute.
EU 4 EU 5 EU 6	7. In accordance with MassDEP Approval 1-P-88-030 (2/3/89) or 310 CMR 7.13, perform, at the request of MassDEP, tests to characterize VOC and solids contents of the coatings used.
	8. In accordance with MassDEP Approval 1-P-88-030 (2/3/89) or 310 CMR 7.13, perform VOC capture and destruction tests on the catalytic oxidizer and the No. 4 Laminator, at the discretion of MassDEP.
EU 9a EU 9b	9. 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 once each calendar year.
	10. In accordance with 310 CMR 7.00 Appendix C(9)(b), monitor sulfur content of each new shipment of No. 2 fuel oil received. Compliance with % sulfur-in-fuel requirements can be demonstrated through testing (testing certification) or by maintaining a shipping receipt from the fuel supplier (shipping receipt certification).  The testing certification or shipping receipt certification of % sulfur-in-fuel shall document that sulfur testing has been done in accordance with the applicable ASTM test methods (D129-95, D1266-91, D1552-95, D2622-92, and D4294-90) or any other method approved by the MassDEP and EPA.
	11. In accordance with 310 CMR 7.02(8), any compliance determination with the allowable particulate emission rate shall be in accordance with the EPA Methods 1 – 5, as specified in 40 CFR Part 60, Appendix A.
EU 10	12. In accordance with 310 CMR 7.18(8)(h), upon request of the MassDEP or EPA, perform or have performed tests to demonstrate compliance with 310 CMR 7.18(8).
EU 11	13. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), upon request of the MassDEP, perform tests to characterize coating VOC and solids content, and/or tests to determine stack emissions, according to MassDEP prescribed methods.

<b>Table 4</b>	
<b>EU</b>	<b>Monitoring And Testing Requirements</b>
EU 5 EU 6 EU 11	14. In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, continuously monitor the REECO RTO combustion chamber temperature (°F).
	15. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, the chamber temperature shall be monitored with a thermocouple. Accuracy of the thermocouple shall be verified by a second, or redundant, thermocouple probe inserted into the oxidizer chamber with a hand-held meter. This validation check shall be conducted at least annually. The acceptance criterion is $\pm 15^{\circ}\text{F}$ .
	16. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, test the REECO RTO combustion chamber temperature alarm(s) at least once per calendar year.
	17. In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, continuously monitor the total inlet airflow to the REECO RTO to ensure that the REECO RTO capacity is not exceeded.
	18. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, test the REECO RTO airflow alarm(s) at least once per calendar year.
	19. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, remove the pitot airflow traverse probe from the incinerator air duct and clean semi-annually with a soft brush and compressed air.
	20. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, monitor at least once per calendar month the face velocity of each natural draft opening ("NDO") to ensure each is $\geq 200$ feet per second.
	21. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, monitor at least once per calendar month by means of a checklist the physical parameters of the enclosure that are indicative of 100% capture efficient operation.
	22. In accordance with MassDEP Approval 1-P-95-062 (4/14/97) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, monitor on a continuous chart recorder the position of dryer dampers, indicating when the dryer exhaust is going to the oxidizer or to atmosphere.
Facility-wide	23. In accordance with 310 CMR 7.13 Stack Testing, conduct stack testing, upon written request of the MassDEP, for any air contaminant for which the MassDEP has determined testing is necessary, to ascertain compliance with the MassDEP's regulations or design approval provisos. All such testing shall be conducted in accordance with 310 CMR 7.13 (1) and (2), and in accordance with the applicable procedures specified in 40 CFR 60 Appendix A or other method if approved by the MassDEP and EPA.
	24. In accordance with 310 CMR 7.00 Appendix C(9)(b), any compliance determination with the allowable opacity emission limit shall be in accordance with EPA Method 9, as specified in 40 CFR 60, Appendix A.
	25. In accordance with 310 CMR 7.18(14)(h), upon request of the MassDEP, perform or have performed tests to demonstrate compliance. Testing shall be conducted in accordance with EPA Method 24 and/or Method 25 as described in CFR Title 40 Part 60, or by other methods approved by the MassDEP and EPA.
	26. In accordance with 310 CMR 7.71(1) and Appendix C(9), the Permittee shall establish and maintain data systems or record keeping practices (e.g. fuel use records, SF <sub>6</sub> 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. <b>(State Only Requirement)</b>

**Table 4 Key:**

EU = Emission Unit  
 CAM = Compliance Assurance Monitoring  
 CFR = Code of Federal Regulations  
 CMR = Code of Massachusetts Regulations  
 EPA = Environmental Protection Agency  
 RTO = Regenerative Thermal Oxidizer

ASTM = American Society for Testing Materials  
 VOC = Volatile Organic Compounds  
 °F = degrees Fahrenheit  
 $\pm$  = plus or minus  
 $\geq$  = greater than or equal to  
 % = percent

<b>Table 5</b>	
<b>EU</b>	<b>Record Keeping Requirements</b>
EU 1	1. In accordance with MassDEP Approval 1-P-90-046 (8/31/90; amended 11/3/95), verify and record in a written log, each time that the electronic controls installed on the #1 Laminator's drive are accessed to change the line speed when using coatings containing > 1.4 lb VOC/GSA.
	2. In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain on-site for a minimum of 5 years the records concerning each time the electronic controls are accessed to make changes under the specified conditions.
EU 1 EU 2 EU 5	3. In accordance with 310 CMR 7.18(14)(g), prepare and maintain daily records sufficient to demonstrate compliance consistent with the applicable averaging time as stated in 310 CMR 7.18(2).
	4. In accordance with 310 CMR 7.18(14)(g), keep records to demonstrate compliance on-site for five years and make these records available to representatives of the MassDEP and EPA upon request.
EU 3 EU 4 EU 6	5. In accordance with MassDEP Approval 1-P-88-030 (2/3/89), maintain records for the previous 5 years detailing for each day: a) the number of gallons of each specific coating applied, and b) the VOC content of each of these coatings (lb VOC/GSA), and c) the lb VOC emitted before and after controls.
	6. In accordance with MassDEP Approval 1-P-88-030 (2/3/89) and a letter from MassDEP to Hazen dated 5/17/96, generate "in-house" before the 15th of each month summary reports containing for each machine the pounds VOC emitted before and after control, and the control device efficiency, and maintain these reports on file and available to the MassDEP for review for a minimum of five (5) years.
EU 4	7. In accordance with Regulation 310 CMR 7.18(2)(e), 310 CMR 7.00 Appendix C(10)(b), and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain on-site for a minimum of 5 years the data logger records of the catalyst chamber and exhaust temperature, and all supporting information, including, at a minimum, all calibration and maintenance records, all data logger records, the operating conditions existing at the time of the measurement(s), and copies of any other information required to interpret the monitoring data.
	8. In accordance with Regulation 310 CMR 7.18(2)(e), 310 CMR 7.00 Appendix C(9)(b)2., 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the date the catalyst was most recently added to, replaced, and/or changed.
	9. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the catalytic oxidizer temperature alarm(s) except those that occur as a result of startup or shutdown.
	10. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the face velocity of each NDO.
EU 5 EU 6 EU 11	11. In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the REECO RTO combustion zone temperature (°F).
	12. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the REECO RTO temperature alarm(s) except those that occur as a result of startup or shutdown.
	13. In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the total inlet airflow to the REECO RTO.
	14. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the REECO RTO airflow alarm(s) except those that occur as a result of startup or shutdown.
	15. In accordance with MassDEP Approval 1-P-98-013 (6/16/98), maintain up-to-date records of training and personnel who are qualified to operate the REECO RTO, and ensure that it is operated only by personnel who are trained in its proper use and operation.
	16. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain records of the face velocity verifications of each NDO.

**Table 5**

EU	Record Keeping Requirements
EU 5 EU 6 EU 11	17. In accordance with 310 CMR 7.00 Appendix C(10)(b) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, maintain on-site for a minimum of 5 years the strip/circular chart records of the REECO RTO exhaust gas temperature and all supporting information, including, at a minimum, all calibration and maintenance records, all original strip/circular charts, the operating conditions existing at the time of the measurement(s), and copies of any other information required to interpret the monitoring data
EU 9a EU 9b	<p>18. In accordance with 310 CMR 7.04(4)(a), maintain records of the results of the inspection, maintenance, and annual testing required by this Regulation and post these results conspicuously on or near the boiler.</p> <p>19. In accordance with 310 CMR 7.00 Appendix C(9)(b)2., demonstrate compliance for each new shipment of No. 2 fuel oil received with the % sulfur-in-fuel requirements specified in 310 CMR 7.05(1)(a)1. by testing certification or shipping receipt certification, either of which must certify that the shipment complies with the ASTM specifications for distillate oil and the specified % sulfur-in-fuel requirements.</p> <p>20. The Permittee shall maintain records for oil burning, when and why oil was used and how many hours per calendar year oil was used for maintenance, testing and operator training in order to demonstrate EU 9a and EU 9b meet the definition under §63.11237 of "Gas-fired boiler" and is exempt from 63 subpart JJJJJ, in accordance with §63.11225(c) and (g).</p>
EU 10	<p>21. In accordance with 310 CMR 7.03(3) and 7.18(8), prepare and maintain daily records sufficient to demonstrate compliance with a solvent use rate of less than 100 gallons per calendar month.</p> <p>22. In accordance with 310 CMR 7.18(8)(g), prepare and maintain daily records sufficient to demonstrate continuous compliance consistent with an averaging time as stated in 310 CMR 7.18(2)(a). Records kept to demonstrate compliance shall be kept on-site for five years and shall be made available to representatives of the MassDEP and EPA upon request. Such records shall include, but are not limited to:</p> <ul style="list-style-type: none"> <li>a) identity, quantity, formulation and density of solvent(s) used, and</li> <li>b) quantity, formulation and density of all waste solvent(s) generated, and</li> <li>c) actual operational and performance characteristics of the degreaser.</li> </ul>
EU 11	<p>23. In accordance with MassDEP Approval 1-P-95-062 (4/14/97) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, record the position of dryer dampers on the P6 Press, indicating when the dryer exhaust is going to the oxidizer or to atmosphere.</p> <p>24. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), establish and continue an on-site daily recordkeeping system for determining the VOC emissions from the use of inks and coatings. Emissions from cleaning operations will be determined by means of a monthly inventory system. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination. Record keeping shall include sufficient operating records to demonstrate compliance with the 9,000 lb VOC/calendar month and 23.5 tons per year (rolling 12-month total) limits.</p>
Facility-wide	<p>25. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), conduct an annual inventory of ink and solvent used in the ink mixing and storage room and solvent storage tanks, and compare annually the VOC emissions determined by the daily tracking system and VOC emissions determined by the annual inventory.</p> <p>26. In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain records of all monitoring data and supporting information on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application.</p> <p>27. In accordance with 310 CMR 7.12, maintain the records required to determine the nature and amounts of emissions from the facility.</p> <p>28. In accordance with 40 CFR 63.829(d), maintain records of all required measurements and calculations needed to demonstrate compliance with 40 CFR Part 63 Subpart KK criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.</p> <p>29. In accordance with 310 CMR 7.12(3)(c), Copies of Source Registration and other information supplied to the Department, to comply with 310 CMR 7.12 shall be retained by the facility owner/operator for five years from the date of submittal.</p>

<b>Table 5</b>	
<b>EU</b>	<b>Record Keeping Requirements</b>
Facility -wide	30. In accordance with 310 CMR 7.71 (6) (b) and (c), the Permittee shall keep on site at the facility documents of the methodology and data used to quantify emissions for a period of 5 years from the date the document is created. The Permittee shall make these documents available to MassDEP upon request. <b>(State Only Requirement).</b>

**Table 5 Key**

EU = Emission Unit

CAM = Compliance Assurance Monitoring

CFR = Code of Federal Regulations

CMR = Code of Massachusetts Regulations

EPA = U.S. Environmental Protection Agency

GSA = Gallon of Solids Applied

lb = Pounds

NDO = Natural Draft Opening

PCD = Pollution Control Device

RTO = Regenerative Thermal Oxidizer

VOC = Volatile Organic Compound

lb/VOC = pounds of Volatile Organic Compound

lb VOC/GSA = Pounds Volatile Organic Compound per  
Gallon of Solids Applied

°F = degrees Fahrenheit

% = Percent

<b>Table 6</b>	
<b>EU</b>	<b>Reporting Requirements</b>
EU 10	1. In accordance with 310 CMR 7.03(2), report to the MassDEP any construction, substantial reconstruction or alteration of a degreaser described in 310 CMR 7.03(5) on the next required Source Registration/Emission Statement, in accordance with 310 CMR 7.12.
EU 11	2. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), notify the MassDEP in writing prior to the 15th day of the following month if monthly limits established for EU 11 in Table 3 of this Operating Permit are exceeded.
Facility -wide	3. In accordance with 310 CMR 7.12, the Permittee shall submit a Source Registration/Emission Statement Form to MassDEP using the electronic data system on an annual basis.
	4. In accordance with 310 CMR 7.13(1) and 7.13(2), if determined by MassDEP that stack testing is necessary to ascertain compliance with the Department's regulations or design approval provisos, the Permittee shall cause such stack testing to be summarized and submitted to MassDEP as prescribed in the agreed to pretest protocol.
	5. In accordance with 310 CMR 7.00 Appendix C(10)(a), submit to the 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 the MassDEP or EPA.
	6. 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 <b>months (January 30 and July 30 of each calendar year)</b> .
	7. In accordance with <b>General Condition 10</b> of this Permit, the Permittee shall submit the Annual Compliance report to MassDEP and EPA by January 30 of each year.
	8. In accordance with 310 CMR 7.00 Appendix C(10)(f), the Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention all instances of deviations from permit requirements as required by <b>General Condition 25</b> of this Permit.
	9. In accordance with 310 CMR 7.71(5) and 7.12, the Permittee shall electronically submit and certify a greenhouse gas emissions report to MassDEP on an annual basis. <b>(State Only Requirement)</b> .

**Table 6 Key**

EU = Emission Unit

PCD = Pollution Control Device

CMR = Code of Massachusetts Regulations

EPA = U.S. Environmental Protection Agency

**Table 6 Notes:**

- 1) The annual Source Registration/Emission Statement report shall be submitted to the MassDEP office specified in the instructions. ***All other reports, including both 6-month summary reports, are to be submitted to the Western Regional Office address, as specified on the letterhead of this Operating Permit.***

**C. GENERAL APPLICABLE REQUIREMENTS**

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

**D. REQUIREMENTS NOT CURRENTLY APPLICABLE**

The Permittee is currently not subject to the following requirements:

<b>Table 7</b>	
<b>Regulation</b>	<b>Reason</b>
310 CMR 7.16 Reduction of Single Occupant Commuter Vehicle Use	Facility employs fewer than 250 people
310 CMR 7.25: Consumer and Commercial Products	Not applicable.
40 CFR 63 Subpart T: National Emission Standards for Halogenated Solvent Cleaning	Not applicable.
Clean Air Act Section 112(r): Prevention of Accidental Release	Facility does not store, use or process any of the listed compounds in quantities greater than the threshold.



## 5. SPECIAL TERMS AND CONDITIONS

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

<b>Table 8.</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
EU 1	1. In accordance with MassDEP Approval 1-P-90-046 (8/31/90; amended 11/3/95), only operate the #1 Laminator with a mechanical/physical limitation device installed that prevents operation at line speeds greater than 500 feet per minute when utilizing coatings containing > 1.4 lb VOC/GSA. In a letter (dated 8/01/16), the mechanical limitation device has been replaced by an electronic control. The drive system on the #1 Laminator had to be replaced and the mechanical limitation would not work with the new electronic drive system
EU 4	2. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, ensure that the interior and exterior of the catalytic oxidizer is inspected at least annually by a qualified outside consultant or by the manufacturer's representative to ensure the oxidizer operates in accordance with the manufacturer's specifications.
	3. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, ensure that during the annual catalytic oxidizer inspection, the catalyst blocks are removed and replaced with a set of clean catalyst blocks.
	4. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, ensure that the accuracy of the thermocouple is verified at least once per calendar year by a second, or redundant, thermocouple probe inserted into the oxidizer chamber with a handheld meter. The acceptance criterion shall be $\pm 15^{\circ}\text{F}$ .
	5. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, ensure the electronic data loggers are calibrated to the thermocouples at least once per calendar year in accordance with the manufacturer's procedures. In a letter (dated 1/26/17), the circular chart recorders have been replaced by an electronic data logger capable of recording both pre and post catalyst temperatures on a single chart. This change is reflected in Table 1 Section 3 and note 3 of the Facility CAM Plan for the #4 laminator.
	6. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, ensure that if the catalytic oxidizer inlet temperature drops below 700°F, an audible alarm and flashing strobe activates to alert the operator of the problem. The airflow will be shut down within 10 minutes of the alarm/strobe notification. In a letter (dated 8/01/16), the flashing strobe light has been replaced by a solid warning light. The flashing strobe light caused the CO <sub>2</sub> sensor to fire, setting off the CO <sub>2</sub> fire suppression system in the press station.
	7. In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, operate the catalytic oxidizer exhaust gas temperature monitoring system at all times that this emission unit is operating, except for periods of calibration checks and preventive maintenance. Obtain valid temperature data for at least 90% of the operating hours for every 12-month period (rolling 12-month total) during which this emission unit is operating.
	8. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, ensure that the anemometer used for measuring NDO face velocities is calibrated at least once per calendar year, in accordance with the manufacturer's procedures.
	9. In accordance with 40 CFR Part 64 and the facility CAM Plan dated 04/28/2022, ensure that the average velocity through the NDOs is $\geq 200$ feet per minute.

**Table 8.**

EU	Special Terms and Conditions
EU 11	<p>10. In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, operate the dryer damper position monitoring system at all times that this emission unit is operating, except for periods of calibration checks and preventive maintenance. Obtain valid dryer damper position data for at least 90% of the operating hours for every 12-month period (rolling 12-month total) during which this emission unit is operating.</p> <p>11. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), keep station enclosure doors closed when operating the station with a coating containing <math>\geq 2.4</math> lb VOC/GSA, except when gravure cylinders are being cleaned.</p> <p>12. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), post near Printer 6 and adhere to the criteria for VOC capture efficiency – U.S. EPA Procedure T guidelines for permanent total enclosures (PTE) for the unit. The criteria for PTE are the following:</p> <ul style="list-style-type: none"> <li>a) All access doors, windows &amp; hood latches are closed during normal operation.</li> <li>b) The interior of the PTE is under negative pressure to the outside environment.</li> <li>c) The average velocity through the NDOs must be greater than 200 feet per minute.</li> <li>d) Sources of VOC in the PTE must be at least four equivalent diameters from each NDO.</li> <li>e) The total area of all NDOs must be less than five percent of the total area of the enclosure.</li> </ul> <p>13. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), route all exhaust to the REECO RTO from stations where cleaning solution containing more than 15% VOC by weight is used.</p> <p>14. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), limit throughput of VOCs through the main ink mixing room and storage room (Buildings 26 &amp; 26A) to 2,150,000 lb per calendar year.</p> <p>15. In accordance with MassDEP Approval 1-P-95-062 (4/14/97), keep clean-up solutions containing VOCs in tightly covered containers during transport and storage; and cleaning rags used in conjunction with the cleanup solution shall be placed, when not in use, in closed containers and collected for proper disposal.</p>
EU 5 EU 6 EU 11	<p>16. In accordance with MassDEP Approval 1-P-98-013 (6/16/98), not operate the REECO RTO at inlet airflows exceeding 25,000 SCFM.</p> <p>17. In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, equip the REECO RTO with both visual and audible alarms which will alert the operators when the exhaust gas temperature falls below 1450°F.</p> <p>18. In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, operate the REECO RTO exhaust gas temperature monitoring system at all times that any of these emission units are operating (noting the exception that EU 11 may vent to atmosphere; see Table 3), except for periods of calibration checks and preventive maintenance. Obtain valid temperature data for at least 90% of the operating hours for every 12-month period (rolling 12-month total) during which these emission units are operating.</p> <p>19. In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, operate the airflow monitoring system at all times that any of these emission units are operating (noting the exception that EU 11 may vent to atmosphere; <b>see Table 3</b>), except for periods of calibration checks and preventive maintenance. Obtain valid airflow data for at least 90% of the operating hours for every 12-month period (rolling 12-month total) during which these emission units are operating.</p> <p>20. In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, operate and maintain an alarm which indicates if the airflow at the inlet of the REECO RTO exceeds 24,500 SCFM.</p>

<b>Table 8.</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
EU 5 EU 6 EU 11	21. In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 04/28/2022, ensure that the anemometer used for measuring NDO face velocities is calibrated at least annually in accordance with the manufacturer's procedures.
	22. In accordance with 40 CFR Part 64 and the facility CAM Plan dated 04/28/2022, ensure that the average velocity through the NDOs is $\geq$ 200 feet per minute.
Facility -wide	23. The Permittee shall, in accordance with 310 CMR 7.18(1)(c), store and dispose of volatile organic compounds in a manner which will minimize evaporation to the atmosphere.
	24. The Permittee shall in accordance with 310 CMR 7.18(1)(d), continue to comply with all the applicable requirements of 310 CMR 7.18(14) even if emissions from the facility no longer exceed the applicability requirements therein.

**Table 8 Key**

EU = Emission Unit  
 CAM = Compliance Assurance Monitoring  
 CFR = Code of Federal Regulations  
 CMR = Code of Massachusetts Regulations  
 CO<sub>2</sub> = Carbon Dioxide  
 EPA = U.S. Environmental Protection Agency  
 GSA = Gallon of Solids Applied  
 lb = Pounds  
 NDO = Natural Draft Opening  
 PTE = Potential to Emit  
 PCD = Pollution Control Device

RTO = Regenerative Thermal Oxidizer  
 VOC = Volatile Organic Compound  
 SCFM = Standard Cubic Feet per Minute  
 °F = degrees Fahrenheit  
 % = Percent  
 > = Greater Than  
 $\geq$  = Greater Than or Equal to  
 °F = Degrees Fahrenheit  
 % = Percent  
 lb VOC/GSA = pounds Volatile Organic Compounds per  
 Gallon of Solids Applied

## **6. ALTERNATIVE OPERATING SCENARIOS**

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

## **7. EMISSIONS TRADING**

### **A. INTRA-FACILITY EMISSION TRADING**

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

### **B. INTER-FACILITY EMISSION TRADING**

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

## **8. COMPLIANCE SCHEDULE**

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

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

## GENERAL CONDITIONS FOR OPERATING PERMIT

### 9. FEES

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

### 10. COMPLIANCE CERTIFICATION

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

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

The "Operating Permit Reporting Kit" contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring Summary Report and Certification. The "Operating Permit Reporting Kit" is available to the Permittee via the MassDEP's web site, <https://www.mass.gov/guides/massdep-operating-permit-compliance-program#-operating-permit-reporting-kit->.

#### A. Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this Operating Permit. The report shall be postmarked or delivered by January 30 to the MassDEP and to  
Director, Enforcement and Compliance Assurance Division  
Attn: Air Compliance Clerk (Mail Code 04-2)  
U.S. Environmental Protection Agency - Region 1  
5 Post Office Square, Suite 100  
Boston, MA 02109.

The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- 3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and

- 4) any additional information required by the MassDEP to determine the compliance status of the source.

**B. Semi-Annual Monitoring Summary Report and Certification**

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

The compliance certification and report shall describe:

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

**11. NONCOMPLIANCE**

Any noncompliance with a permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for Permit termination or revocation, or for denial of an Operating Permit renewal application by the MassDEP and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

**12. PERMIT SHIELD**

- A. This Facility has a permit shield provided that it operates in compliance with the terms and conditions of this Permit. Compliance with the terms and conditions of this Permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7, for the

emission units as described in the Permittee's application and as identified in this Permit.

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

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

### **13. ENFORCEMENT**

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.04(9), 7.05(8), 7.18(1)(b), 7.70, 7.71, 7.72, 7.73, 7.74, 7.75, 7.76 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A

All other terms and conditions contained in this Permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the MassDEP, EPA and citizens as defined under the Act.

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

### **14. PERMIT TERM**

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

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

### **15. PERMIT RENEWAL**

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

In the event the MassDEP has not taken final action on the Operating Permit renewal application prior to this Permit's expiration date, this Permit shall remain in effect until the MassDEP takes final action on the renewal application, provided that a timely and complete renewal application has been submitted in accordance with 310 CMR 7.00: Appendix C(13).

## **16. REOPENING FOR CAUSE**

This Permit may be modified, revoked, reopened, and reissued, or terminated for cause by the MassDEP and/or EPA. The responsible official of the Facility may request that the MassDEP terminate the facility's Operating Permit for cause. The MassDEP will reopen and amend this Permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C(14).

The filing of a request by the Permittee for an Operating Permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any Operating Permit condition.

## **17. DUTY TO PROVIDE INFORMATION**

Upon the MassDEP's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the MassDEP copies of records that the Permittee is required to retain by this Permit.

## **18. DUTY TO SUPPLEMENT**

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

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

## **19. TRANSFER OF OWNERSHIP OR OPERATION**

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



## **20. PROPERTY RIGHTS**

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

## **21. INSPECTION AND ENTRY**

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the MassDEP, and EPA to perform the following:

- A. Enter upon the Permittee's premises where an operating permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- C. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- D. Sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the Operating Permit or applicable requirements as per 310 CMR 7.00 Appendix C(3)(g)(12).

## **22. PERMIT AVAILABILITY**

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

## **23. SEVERABILITY CLAUSE**

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

## **24. EMERGENCY CONDITIONS**

The Permittee shall be shielded from enforcement action brought for noncompliance with technology 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

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

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

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. PERMIT DEVIATION**

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

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

- A. Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
- B. Exceedances of parameter limits established by this 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, this Operating Permit, or other approvals.
- E. Failure to perform QA/QC measures as required by this 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 Air and Waste Air Operating Permit Reporting Kit, which

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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.

is available to the Permittee via the MassDEP's web site, <https://www.mass.gov/guides/massdep-operating-permit-compliance-program#-operating-permit-reporting-kit>.

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 Air and Waste 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 (15) days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(h) and (i). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C(7)(a) and will be appended to the Facility's Permit. The permit shield allowed for at 310 CMR 7.00: Appendix C(12) shall not apply to these changes.

## **27. MODIFICATIONS**

- A. Administrative Amendments - The Permittee may make changes at the Facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).
- B. Minor Modifications - The Permittee may make changes at the Facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d).
- C. Significant Modifications - The Permittee may make changes at the Facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(c).
- D. No permit revision shall be required, under any approved economic incentives program, marketable permits program, emission trading program and other similar programs or processes, for changes that are provided in this Operating Permit. A revision to the Permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Act, provided that such increases do not require an Operating Permit revision under any other applicable requirement.

## **28. OZONE DEPLETING SUBSTANCES**

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

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

as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.

- E. The Permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

## **APPEAL CONDITIONS FOR OPERATING PERMIT**

This Permit is an action of the MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this Permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C(6), with respect to the MassDEP's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the Facility must continue to comply with all existing federal and state applicable requirements to which the Facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the Facility shall not be in violation of the Act for operating without a Permit.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the Permit is not consistent with applicable laws and regulations.

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

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

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

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

The MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.