



# Department of Environmental Protection

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

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## FINAL AIR QUALITY OPERATING PERMIT

(Administrative Amendment to MBR-95-OPP-065R, Transmittal X226382)

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

Bradford Coatings, Inc.  
75 Rogers Street  
Lowell, MA 01852

### FACILITY LOCATION:

Bradford Coatings, Inc.  
75 Rogers Street  
Lowell, MA 01852

### NATURE OF BUSINESS:

Direct, gravure, and transfer  
coating of substrates using  
urethane, vinyl, inks, and topcoats

### RESPONSIBLE OFFICIAL:

Name: Mr. Larry Vincent  
Title: Vice President of Operations  
and Supply Chain

### INFORMATION RELIED UPON:

Application No. MBR-95-OPP-065A3  
Transmittal No. X271635

### FACILITY IDENTIFYING NUMBERS:

AQ ID: 1210087  
FMF FAC NO. 131002  
FMF RO NO. 53668

### STANDARD INDUSTRIAL CLASSIFICATION: 2295

### NORTH AMERICAN INDUSTRIAL CLASSIFICATION SYSTEM (NAICS): 313320

### FACILITY CONTACT PERSON:

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**This Operating Permit shall expire on June 26, 2017.**

For MassDEP, Bureau of Air and Waste

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Susan P. Ruch  
Acting Permit Chief and Deputy Regional Director

**December 19, 2016**

Date

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## **SPECIAL CONDITIONS FOR OPERATING PERMIT**

### **1. PERMITTED ACTIVITIES**

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

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

Bradford Industries (“the Permittee”) is a specialty coated fabric manufacturer located at 75 Rogers Street, Lowell, Massachusetts (“the Facility”) with products in the automotive, industrial, medical, military, aerospace and commercial markets. The Permittee operates six (6) coating lines of various capabilities designated as EUC1, EU-C4, EU-C5, EU-E1, EU-E2, and EU-C2K, two coating compound preparation areas designated as EU-URE, and EU-INK, a regenerative thermal oxidizer designated as PCD1, a recuperative thermal oxidizer designated as PCD2, and a dust collector designated as PCD3, for air quality management.

The Facility has potential emissions of volatile organic compounds (VOC) and Hazardous Air Pollutants (HAPs) greater than the applicable major thresholds.

Coating lines EU-C1, EU-C4, and EU-C2K and the two coating compound preparation areas EU-URE and EU-INK are controlled by PCD1, PCD2, and PCD3 and are subject to 40 CFR 64, Compliance Assurance Monitoring (CAM) requirements. PCD1 captures and controls at least 96.2 percent (%) by weight of the VOC and HAPs applied on EU-C1, EU-C4, EU-INK, and EU-URE. PCD2 captures and controls at least 99 % by weight of the VOC and HAPs applied on EU-C2K and EU-URE. PCD3 was approved via Approval No. MBR-05-IND-004 to control the particulate matter that was exhausted by PCD2.

The controlled and uncontrolled VOC emissions from EU-C1, EU-C4, EU-C5, EU-E1, and EU-E2 are averaged pursuant to Approval MBR-86-BUB-010 which MassDEP is renewing pursuant to 310 CMR 7.00: Appendix B(4)(f)(2). EU-C2K, EU-URE, and EU-INK are subject to the New Source Performance Standards (NSPS) 40 CFR 60, Subpart VVV. EU-C1, EU-C4, EU-E1, and EU-E2 are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR Part 63, Subpart KK. EU-C1, EU-C2K, EU-E1, EU-E2, EU-URE, and EU-INK are subject to 40 CFR Part 63, Subpart OOOO. EU-E2 is subject to 40 CFR Part 63, Subpart TTTT, but is in the process of an applicability request with US EPA Region I to delete this applicability. EU-C5 is subject to record keeping and reporting requirements of 40 CFR Part 63, Subpart JJJJ even though the coating line does not utilize or apply any HAP containing coatings.

Tables 3, 4, 5, 6, 8, 9, and 10 of this Operating Permit contain the Air Quality requirements and regulations to which the Permittee is subject. Table 7 of this Operating Permit contains Air Quality requirements to which the Permittee is not subject as well as the reasoning utilized in determining the non-applicability status.

## 2. EMISSION UNIT IDENTIFICATION

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

<b>Table 1</b>			
<b>Emission Unit (EU)</b>	<b>Description of Emission Unit</b>	<b>EU Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU-C1	Casting Line C-1 (4 knife over roll coaters, 4 drying ovens)	2,300 yards of coated substrates per hour	Permanent Total Enclosures (PTEs) for all four (4) coating stations and four (4) drying ovens vented to Huntington Energy Systems regenerative thermal oxidizer (PCD1)
EU-C4*	Casting Line C-4 (4 knife over roll coaters, 4 drying ovens)	1,400 yards of coated substrates per hour	PTEs for coating stations No. 1 and No. 2 and all four (4) drying ovens vented to PCD1
EU-C5	Casting Line C-5 (1 knife over roll coater, 3 drying ovens)	700 yards of coated substrates per hour	None
EU-E1	Finishing Line E-1 (3 gravure coaters, 2 drying ovens)	1,800 yards of printed substrate per hour	None
EU-E2	Finishing Line E-2 (4 gravure coaters, 3 drying ovens)	1,800 yards of printed substrate per hour	None
EU-C2K	Casting Line C2K (4 knife over roll coaters, 1 dip station, 5 drying ovens)	4,000 yards of coated substrate per hour	PTEs for all four (4) coating stations, one (1) dip station, and five (5) drying ovens vented to ABB Preheater, Inc. Model No. 40.OTRG62 recuperative thermal oxidizer (PCD2) and Dustex Corp. Model No. 6314-13-38 dust collector (PCD3)
EU-URE	Urethane compounding department (Mixer Nos. 8,9, 11,12,13, 14, 28, and 29)	Not Applicable	PCD1 is primary and PCD2 is the secondary control device
EU-INK	Mixer No. 30	Not Applicable	PCD1
EU26-A	Natural gas fired space heater	11 MMBtu/hr	None
EU26-B	Natural gas fired space heater	11 MMBtu/hr	

\* Key to Table 1

EU-C4 is only equipped with PTEs on Coating Stations 1 and 2. Coating Stations 3 and 4 are not equipped with PTEs. However, the process air from the drying ovens associated with each of these coating stations is vented to PCD1 for control.

MMBtu/hr = million British thermal units per hour

### 3. IDENTIFICATION OF EXEMPT ACTIVITIES

The following (Table 2) have been found to be exempt activities as provided in 310 CMR 7.00:Appendix C(5)(h):

<b>Table 2</b>	
<b>Description of 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 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 emission limits/restrictions as contained in Table 3 below:

<b>Table 3</b>					
<b>EU #</b>	<b>Fuel/Raw Material</b>	<b>Pollutant</b>	<b>Operational and/or Production Limits</b>	<b>Emission Limit/Standard</b>	<b>Applicable Regulations and/or Approval No.</b>
EU-C1, EU-C4, EU-C5, EU-E1, EU-E2	VOC and HAPs containing coatings	VOC	NA	AcE ≤ AIE for EU-C1, EU-C4, EU-C5, EU-E1, and EU-E2, on a 24 hour basis	MBR-86-BUB-010 310 CMR 7.00:Appendix B(4) MBR-95-OPP-065R

<b>Table 3</b>						
<b>EU #</b>	<b>Fuel/Raw Material</b>	<b>Pollutant</b>	<b>Operational and/or Production Limits</b>	<b>Emission Limit/Standard</b>	<b>Applicable Regulations and/or Approval No.</b>	
EU-C1, EU-C4, EU-E1, EU-E2	VOC and HAPs containing coatings	HAPs	NA	< 0.2 kg of HAPs applied per kg of solids applied on a monthly basis	40 CFR Part 63, Subpart KK 63.825(b)(5)	
EU-C1		VOC and HAPs	PTES for EU-C1 (all four stations and four drying ovens) and PCD1 destruction efficiency of at least 96.2% by weight and capture efficiency of 100%	NA		STACK TESTING APPROVAL dated July 18, 1994 and MBR-89-IND-290
			Maintain minimum combustion chamber temperature of PCD1 $\geq 1422$ °F			STACK TESTING APPROVAL dated December 22, 2011
EU-C1, EU-C2K, EU-URE, EU-INK		HAPs	NA		< 0.12 kg of HAPs emitted per kg of solids applied on a monthly basis	40 CFR Part 63, Subpart OOOO 63.4290 Table 1 Item 2
EU-E1, EU-E2						
EU-C4		VOC and HAPs	PTEs for EU-C4 (2 of 4 stations and all four drying ovens) and PCD1 destruction efficiency of at least 96.2% by weight and capture efficiency of 90%	NA		STACK TESTING APPROVAL dated July 18, 1994 and MBR-89-IND-290

<b>Table 3</b>					
EU #	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emission Limit/Standard	Applicable Regulations and/or Approval No.
EU-C2K	VOC and HAPs containing coatings	VOC	PTEs for each of 4 coating stations, 1 dip station, and five (5) drying ovens PCD2's destruction efficiency of at least 99% by weight. Coatings shall contain no more than 181 pounds of VOC per gallon solids applied before control	1.81 pounds of VOC per gallon solids 17.8 pounds per hour 5.0 tons per month 24.5 tons per twelve month consecutive period <sup>4</sup>	MBR-98-IND-028
		Total HAPs	Maintain PCD2's minimum combustion chamber temperature $\geq$ 1310 °F	3.0 tons per month 14.0 tons per twelve month consecutive period <sup>4</sup>	MBR-98-IND-028
		VOC	Monitor all 3-hour periods during which the average total enclosure monitor readings vary by 5 percent or more from the average value measured during the most recent performance test	NA	40 CFR Part 60, Subpart VVV <sup>1</sup> 60.747(d)(6)
		Particulate Matter	NA	< 0.00225 grains per actual cubic foot per minute at 275°F from PCD3	MBR-05-IND-004
		Opacity		$\leq$ five (5) percent opacity, except for a period or an aggregate period, of two (2) minutes within any one (1) hour when the visible emissions may have an opacity > five (5) percent, but $\leq$ ten (10) percent. Visible emissions shall always be $\leq$ ten (10) percent	

<b>Table 3</b>					
<b>EU #</b>	<b>Fuel/Raw Material</b>	<b>Pollutant</b>	<b>Operational and/or Production Limits</b>	<b>Emission Limit/Standard</b>	<b>Applicable Regulations and/or Approval No.</b>
EU-E2	VOC and HAPs containing coatings	HAPs	Upholstery Leather (<4 grams add-on/square foot)	6.8 pounds of HAPs loss per 1,000 square feet of leather processed	40 CFR Part 63, Subpart TTTT
EU-C5			No HAPs containing coatings will be applied	< 0.2 kg of HAPs applied per kg of solids applied	40 CFR Part 63, Subpart JJJJ 63.3320(b)(3)
EU-URE, EU-INK		VOC	Vent VOC emissions from the covered mix preparation equipment to a 95% by weight efficient control device while preparation of the coating is taking place within the vessel	NA	40 CFR 60, Subpart VVV <sup>1</sup>
EU26-A, EU26-B	Natural Gas only	Particulate Matter	NA	0.12 lb/MMBtu input	310 CMR 7.02(8)(d) 310 CMR 7.04(4)(a)
Facility-wide	NA	Smoke	NA	< No. 1 of Chart <sup>2</sup> , except No. 1 to < No. 2 of Chart for ≤ six (6) minutes during any one hour	310 CMR 7.06(1)(a)
		Opacity		≤ 20 percent except 20 to ≤ 40 percent for ≤ two (2) minutes during any one hour	310 CMR 7.06(1)(b)
		Greenhouse Gas <sup>3</sup>		NA	310 CMR 7.71 (state only)

\*\* Key to Table 3

PTE = Permanent Total Enclosure	< = means less than
EU = Emission Unit	≤ = means less than or equal to
NA = Not Applicable	≥ = means greater than or equal to
VOC = Volatile Organic Compounds	CFR = Code of Federal Regulations
HAPs = Hazardous Air Pollutants	kg = kilogram
°F = degrees Fahrenheit	No. = number
% = means percent	/ = per
MMBtu/hr = million British Thermal Units per hour	



$$AcE = (Ac_1 \times B_1) + (Ac_2 \times B_2)$$

$$AIE = (A_1 \times B_1) + (A_2 \times B_2)$$

- where:
- AcE = the combined actual VOC emissions from the facility in pounds per day
  - AIE = the allowable VOC emissions from the facility in pounds per day
  - Ac<sub>1</sub> = the actual emission rate in pounds of VOC per gallon of solids applied on EU-C1, EU-C4 and EU-C5 per day
  - Ac<sub>2</sub> = the actual emission rate in pounds of VOC per gallon of solids applied for EU-E1 and EU-E2 per day
  - B<sub>1</sub> = the actual number of production units processed each day in gallons of solids applied on EU-C1, EU-C4, and EU-C5
  - B<sub>2</sub> = the actual number of production units processed each day in gallons of solids applied on EU-E1 and EU-E2
  - A<sub>1</sub> = 4.8 pounds of VOC per gallon solids applied (which is the most stringent emission limit for EU-C1, EU-C4, and EU-C5)
  - A<sub>2</sub> = 7.8 pounds of VOC per gallon solids applied (which is the most stringent emission limit for EU-E1 and EU-E2)

- 1 40 CFR 60.742(b)(2) requires use of a PTE around the coating operation and venting the captured VOC emissions from the PTE to a control device that is at least 95 percent by weight efficient. This standard is less stringent than that required in Approval MBR-98-IND-028. However, other sections of 40 CFR, Subpart VVV are applicable to EU-C2K.
- 2 Chart means the Ringelmann Scale for grading the density of smoke, as published by the United States Bureau of Mines and as referred to in the Bureau of Mines Information Circular No. 8333, or any smoke inspection guide approved by the Department.
- 3 Greenhouse Gas means any chemical or physical substance that is emitted into the air and that the department may reasonably anticipate will cause or contribute to climate change including, but not limited to, CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub>, hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs)
- 4 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-C1, EU-C4	1) Monitor operations so that in the event of VOC control device malfunction, a temperature interlock system shall prevent the uncontrolled operation of casting lines EU-C1 and EU-C4. The Permittee shall immediately cease operation of these lines and associated ovens until PCD1 is operating properly, as referenced in Approval MBR-89-IND-290, Proviso No. 7.  2) Inspect temperature interlock system associated with PCD1 monthly to verify system is operational, as referenced in the Permittee's Compliance Assurance Monitoring (CAM) Plan dated November 14, 2011.

**Table 4**

EU #	Monitoring and Testing Requirements
EU-C1, EU-C4	3) In accordance with the Permittee's CAM Plan and Operating Permit Application MBR-95-OPP-065R, complete emission testing at least every three years. The emissions testing program shall include testing for the overall VOC control efficiency for the subject air pollution control equipment as referenced in the 310 CMR 7.13 Stack Test Approval issued by MassDEP for emissions testing completed on August 21, 1998. Each emissions test shall be completed by the end of November of every third year, as referenced in the Stack Test Approval for Approval MBR-89-IND-290 issued by MassDEP on December 28, 2011.
	4) Pursuant to MassDEP's authority through 310 CMR 7.00: Appendix C(9)(b)2., monitor PCD1 maintenance activities.
	5) In accordance with Approval MBR-89-IND-290, monitor operations so that a minimum PCD1 combustion chamber temperature of 1422 degrees Fahrenheit, is achieved prior to start-up of lines EU-C1 and EU-C4 and is maintained at all times during periods of lines EU-C1 and EU-C4 coating operations so that compliance with Special Condition No.B.2 of this Permit (Approval MBR-95-OPP-065R) can be maintained. Temperature monitoring shall include the date and any necessary description of operational changes that may occur as referenced in Approval MBR-89-IND-290, Proviso No. 12.
EU-C1, EU-C4, EU-C5, EU-E1, EU-E2	6) In accordance with Approval MBR-89-IND-290 and Approval MBR-95-OPP-065R, monitor the actual emission rates in pounds of VOC per gallon solids applied on the casting lines, pounds of VOC per gallon solids applied on the finishing lines, total gallons of solids applied on the casting lines, and total gallons of solids applied on the finishing lines, all on a 24 hour basis (3:00 am to 3:00 am).
EU-C1, EU-C4, EU-E1, EU-E2	7) In accordance with 40 CFR Sections 63.827 – 63.828 (Subpart KK; Printing and Publishing Industry), comply with all applicable monitoring/testing requirements as required therein.
EU-C1, EU-C2K, EU-URE, EU-INK	8) In accordance with 40 CFR Sections 63.4360 – 63.4362 and 63.4364 (Subpart OOOO; Printing, Coating and Dyeing of Fabrics and Other Textiles), comply with all applicable monitoring/testing requirements as required therein.
EU-E2	9) In accordance with 40 CFR Sections 63.5355, 63.5360, and 63.5385 – 63.5400 (Subpart TTTT; Leather Finishing Operations), comply with all applicable monitoring/testing requirements as required therein.
EU-C5	10) In accordance with 40 CFR Section 63.3360 – 63.3370 (Subpart JJJJ; Paper and Other Web Coating), comply with all applicable monitoring/testing requirements. In particular, monitor to ensure that each coating material used on this EU does not exceed 0.2 kg organic HAPs per kg coating solids.
EU-C2K	11) In accordance with 40 CFR 60.743(c) of NSPS Subpart VVV, calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates and records the combustion temperature of PCD1 and PCD2. The monitoring device shall have an accuracy within +/- 1% of the temperature being measured in degrees Celsius.
	12) In accordance with 40 CFR Subpart VVV, monitor all 3 hour periods during which the average total enclosure monitor readings vary by 5 percent or more from the average value measured during the most recent performance test.
	13) Monitor operations so that in the event of a PCD2 malfunction, a temperature interlock system shall prevent the uncontrolled operation of EU-C2K. An electronic interlock system shall prevent EU-C2K from operating until PCD2 achieves a minimum oxidizer temperature of 1325°F and shall also prevent EU-C2K from operating if PCD2's combustion chamber temperature falls below 1300°F or exceeds 1800°F, as referenced in Approval MBR-98-IND-028 dated November 30, 2001.
	14) Inspect temperature interlock system associated with PCD2 monthly to verify system is operational, as referenced in the Permittee's CAM Plan.

**Table 4**

EU #	Monitoring and Testing Requirements
EU-C2K (Continued)	15) In accordance with Approval MBR-98-IND-028, monitor to ensure that all coatings used contain no more than 181 pounds of VOC per gallon of solids applied before control.
	16) Operate and maintain temperature monitoring equipment as referenced in Approval MBR-98-IND-028, Proviso No. D.4.
	17) Pursuant to the Department's authority through 310 CMR 7.00: Appendix C(9)(b)2., monitor operations so that any revisions made to the Standard Operating and Maintenance Procedures are submitted to the Department within seven days of the modifications.
	18) The total enclosure shall meet the monitoring and testing requirements in 40 CFR 60.743(b)(1)(i) through (vi) incorporated herein by reference.
	19) Maintain and operate a monitoring device that continuously indicates the combustion temperature of PCD2. The monitoring device shall have an accuracy within +/- 1 percent of the temperature being measured in Celsius degrees as referenced in 40 CFR 60.744(e) of NSPS Subpart VVV incorporated herein by reference.
	20) The Permittee shall calibrate, maintain, and operate, according to the manufacturer's specifications, a monitoring device that continuously indicates the value of the chosen monitoring parameter, as referenced in 40 CFR 60.744(g) and (h) incorporated herein by reference.
	21) In accordance with Approval MBR-98-IND-028, monitor the VOC-containing and HAP-containing materials used during each month, the VOC and HAP content of each material, and the actual emissions of VOC and HAP for the month as well as the prior 11 months.
	22) In accordance with Approval MBR-98-IND-028, compliance testing shall be completed on PCD2 and associated PTEs every two years. The compliance testing of the subject VOC air pollution control system must demonstrate, at minimum, that: a) the enclosure around each coating loading area, coating head and drying nozzles complies with the United States Environmental Protection Agency's (USEPA) Method 204 which outlines criteria for Permanent Total Enclosures; and b) the VOC destruction efficiency of PCD2 is a minimum of 99 percent by weight; and c) that the maximum hourly VOC emission rate, after control, is no more than 17.8 pounds per hour. The compliance testing procedures must follow USEPA and Department methods and guidelines as referenced in Approval MBR-98-IND-028, Proviso No. D.5. Each emissions test shall be completed by the end of November of every odd year.
	23) In accordance with Approval MBR-05-IND-004, The Permittee shall conduct routine leak detection testing on the fabric filter dust collector at least once every three (3) months to determine filter bag leakage and breakage.
	24) In accordance with Approval MBR-05-IND-004, The Permittee shall ensure that at a minimum of one (1) time per workday, a designated plant employee shall conduct an inspection of all air pollution control equipment and related operations/activities for evidence of any visible problems with PM emissions from EU-C2K and associated equipment, including PCD2 and PCD3. If visible PM is identified during said inspection, then PCD2 shall be cleaned during the following weekend and PCD3 shall be inspected for leaking bags at the same time as said cleaning.
EU-URE, EU-INK	25) Monitor to be able to demonstrate that covers meeting the specifications set forth in 40 CFR 60.743(c)(1)(i) through(v) have been installed and are being used properly as provided in 40 CFR 60.743(c), incorporated herein by reference.
	26) Monitor to ensure that procedures detailing the proper use of covers have been posted, as provided in 40 CFR 60.743(c)(2), incorporated herein by reference.

**Table 4**

EU #	Monitoring and Testing Requirements
EU-URE, EU-INK	27) Monitor to ensure that the coating mix preparation equipment is vented to a control device with a minimum 95 weight % VOC control efficiency while applicable preparation of the coating is taking place as provided in 40 CFR 60.743(c)(3), incorporated herein by reference.
EU-C2K, EU-URE, EU-INK	28) In accordance with 40 CFR 60.743(c)(3), monitor to ensure that time periods of mixing or coating operations when the emission control device is malfunctioning or not in use shall be recorded.  29) Comply with the test methods and procedures established in 40 CFR 60.745, incorporated herein by reference, to determine compliance with 40 CFR 60, Subpart VVV.
EU26-A EU26-B	30) Inspect and maintain any fuel utilization facility, having an energy input capacity of $\geq 3$ MMBtu per hour in accordance with manufacturer's recommendations and test for efficient operation at least once in each calendar year as provided in 310 CMR 7.04(4)(a) incorporated herein by reference.
Facility-wide	31) Investigate the feasibility of implementing alternative technologies or reformulated raw material inputs which will lead to the decrease of overall emissions from the facility to the environment. Seek assistance from outside sources such as the Office of Technical Assistance, located at the Executive Office of Environmental Affairs, 251 Causeway Street, Suite 900, Boston, Massachusetts 02114-2136, Telephone (617) 626-1060 as referenced in Approval MBR-98-IND-028, Proviso E. 3.  32) Perform Emissions Compliance Testing (Stack Testing), in accordance with 310 CMR 7.13, 310 CMR 7.19(13)(c), and 40 CFR Part 60, Appendix A or any other testing if and when requested by the Department or EPA.  33) Pursuant to the Department's authority through 310 CMR7.00: Appendix C(9)(b)2., monitor to ensure that all VOC-containing materials such as coatings and cleanup solutions, shall be transported and stored in tightly covered containers.  34) Pursuant to the Department's authority through 310 CMR7.00: Appendix C(9)(b)2., monitor that all cleaning rags used in conjunction with the cleaning solutions shall be placed in tightly covered containers when not in use, and shall be collected for proper recycling or disposal.  35) Pursuant to the Department's authority through 310 CMR7.00: Appendix C(9)(b)2., monitor facility operations so that deviations from Permit requirements can be reported to the Department.  36) Monitor facility operations such that emissions may be calculated as required for compliance with 310 CMR 7.12.  37) In accordance with 310 CMR 7.71(1) and Appendix C(9) establish and maintain data systems or record keeping practices (e.g. fuel use records, SF6 usage documentation, Continuous Emissions Monitoring System) for greenhouse gas emissions to ensure compliance with the reporting provisions of M.G.L. c. 21N, the Climate Protection and Green Economy Act, St. 2008, c. 298, § 6. (State only requirement)

<b>Table 5</b>	
<b>EU #</b>	<b>Record Keeping Requirements</b>
EU-C1, EU-C4	1) Pursuant to the Department’s authority through 310 CMR 7.00: Appendix C(9)(b)2., maintain a record of any PCD1 malfunction, including the cause and steps taken to prevent similar malfunctions from reoccurring in the future.
	2) Maintain a maintenance log for PCD1 which shall record all routine and emergency maintenance work and repairs performed in the VOC control system. Said log shall indicate all VOC control system malfunctions and down time and shall be maintained for a period of at least five years as referenced in Approval MBR-89-IND-290, Proviso No. 13 and Application MBR-95-OPP-065R.
	3) In accordance with the Permittee’s CAM Plan dated November 14, 2011, maintain a record of the compliance test results associated with PCD1.
	4) Oxidizer combustion chamber temperature thermocouples and recording charts shall be utilized for all periods that PCD1 operates. These charts shall be maintained at the Facility for a period of five years and shall be dated, and include any necessary description of operational changes that may occur as referenced in Approval MBR-89-IND-290, Proviso No. 12 and Application MBR-95-OPP-065R.
EU-C1, EU-C4, EU-C5, EU-E1, EU-E2	5) In accordance with Approval MBR-89-IND-290 and Approval MBR-95-OPP-065R, maintain a record of the actual emission rates in pounds of VOC per gallon solids applied on the casting lines, pounds of VOC per gallon solids applied on the finishing lines, total gallons of solids applied on the casting lines, and total gallons of solids applied on the finishing lines, all on a 24 hour basis (3:00 am to 3:00 am).
EU-C1, EU-C4, EU-E1, EU-E2	6) In accordance with 40 CFR Section 63.829 (Subpart KK; Printing and Publishing Industry), comply with all applicable record keeping requirements as required therein.
EU-C1, EU-E1, EU-E2, EU-C2K, EU-URE, EU-INK	7) In accordance with 40 CFR Sections 63.4312 – 63.4313 (Subpart OOOO; Printing, Coating and Dyeing of Fabrics and Other Textiles), comply with all applicable record keeping requirements as required therein.
EU-E1, EU-E2	8) In accordance with 40 CFR Sections 63.5425, 63.5430, and 63.5435 (Subpart TTTT; Leather Finishing Operations), comply with all applicable record keeping requirements as required therein.
EU-C5	9) In accordance with 40 CFR Section 63.3410 (Subpart JJJJ; Paper and Other Web Coating), comply with all applicable record keeping requirements as required therein.
EU-C2K	10) Pursuant to the Department’s authority through 310 CMR7.00: Appendix C(9)(b)2., maintain records to document that all coatings used contain no more than 181 pounds of VOC per gallon of solids applied before control.
	11) Maintain and operate a monitoring device that continuously records the combustion temperature of PCD2. The monitoring device shall have an accuracy within +/- 1 percent of the temperature being measured in Celsius degrees as referenced in 40 CFR 60.744(e) incorporated herein by reference.
	12) The Permittee shall calibrate, maintain, and operate, according to the manufacturer’s specifications, a monitoring device that continuously records the value of the chosen monitoring parameter for PCD2, as referenced in 40 CFR 60.744(g) and (h) incorporated herein by reference.
	13) Operate and maintain the temperature recording equipment, which uses an on-line Supervisor Control and Data Acquisition (SCADA) system to record the temperature in the combustion chamber of PCD2. The temperature records must document the actual operating temperature of PCD2 servicing the five station coating line as referenced in Approval MBR-98-IND-028, Proviso No. D.4.

<b>Table 5</b>	
<b>EU #</b>	<b>Record Keeping Requirements</b>
EU-C2K (Continued)	14) Pursuant to the Department's authority through 310 CMR7.00: Appendix C(9)(b)2., a copy of PCD2's Standard Operating and Maintenance Procedures (SOMP) shall be maintained at the facility at all times. Maintain records so that any revisions made to the SOMP are submitted to the Department within seven days of the modifications.
	15) In order to verify that the VOC and HAP emission rates from EU-C2K do not exceed the emission limits specified in Table 3 of this Permit, maintain on-site adequate records to document compliance with said limits. These records shall include a list of the VOC-containing and HAP-containing materials used during each month, the VOC and HAP content of each material, and the actual emissions of VOC and HAP for the month as well as the prior 11 months as referenced in Approval MBR-98-IND-028, Proviso No. D.12.
	16) In accordance with the Permittee's CAM Plan, maintain a record of the compliance test results associated with PCD2.
	17) In accordance with 40 CFR 60 Subpart VVV and 40 CFR 63 Subpart OOOO, record all 3 hour periods during which the average total enclosure monitor readings for PCD2 vary by 5 percent or more from the average value measured during the most recent performance test.
	18) In accordance with Approval MBR-05-IND-004, The Permittee shall establish and maintain a maintenance log and/or equivalent record keeping system on site to document said testing along with any other maintenance activities performed on PCD3, including replacement of leaking filter bags.
	19) In accordance with Approval MBR-05-IND-004, The Permittee shall maintain a record of the daily inspections conducted of the area surrounding PCD2 and PCD3. Said records shall include the date, time, inspector's name, results of the inspection, and any follow up action as required.
EU-URE, EU-INK	20) In accordance with 40 CFR 60 Subpart VVV, maintain records to document compliance with requirements set forth in 40 CFR 60.743(c).
EU-C2K, EU-URE, EU-INK	21) Record time periods of mixing or coating operations when the emission control device is malfunctioning or not in use as referenced in 40 CFR 60.744(i) of NSPS Subpart VVV, incorporated herein by reference.
	22) Record time periods of mixing or coating operations when each monitoring device is malfunctioning or not in use as referenced in 40 CFR 60.744(j) of NSPS Subpart VVV, incorporated herein by reference.
EU26-A EU26-B	23) In accordance with 310 CMR 7.04(4)(a), maintain results of fuel utilization facility inspection, maintenance, and testing and the date upon which it was performed posted conspicuously on or near the facility.
Facility-Wide	24) Pursuant to the Department's authority through 310 CMR 7.00: Appendix C(9)(d), maintain the test results of any testing or testing methodology required by the Department or EPA.
	25) Maintain an Environmental Logbook or equivalent record keeping system, which shall document all actions associated with environmental issues and overall emissions changes. Record information such as the results of federal, state, or local environmental inspections, maintenance or corrective actions related to pollution control equipment, measures taken to lower overall emissions to the environment, information supplied to them relative to reducing overall air emissions and pollution prevention techniques as referenced in Approval MBR-98-IND-028, Proviso Nos. E.3 and 4.
	26) Maintain records of facility operations such that information may be reported as required for compliance with 310 CMR 7.12. Keep copies of all information supplied to the Department pursuant to 310 CMR 7.12 on site for five (5) years after the date the report is submitted.
	27) Pursuant to the Department's authority through 310 CMR7.00: Appendix C(9)(b)2., maintain a record of deviations from Permit conditions.

<b>Table 5</b>	
<b>EU #</b>	<b>Record Keeping Requirements</b>
Facility-Wide (Continued)	<p>28) Maintain records of all monitoring data and supporting information on site for a period of at least five (5) years from the date of the monitoring sample, measurement, report or initial Operating Permit Application. Supporting information includes at a minimum, all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit, and any other information required to interpret the monitoring data. Records required to be maintained shall include, where applicable:</p> <ul style="list-style-type: none"> <li>a) The date, place as defined in the Permit, and time of sampling or measurements;</li> <li>b) The date(s) analyses were performed;</li> <li>c) The company or entity that performed the analyses;</li> <li>d) The analytical techniques or methods used;</li> <li>e) The results of such analyses; and</li> <li>f) The operating conditions as existing at the time of sampling or measurement</li> </ul> <p>as provided in 310 CMR 7.00:Appendix C(10)(b) incorporated herein by reference.</p>
	<p>29) In accordance with 310 CMR 7.71 (6) b. and c. retain at the facility for five years and make available to the Department upon request copies of the documentation of the methodology and data used to quantify emissions. (State only requirement)</p>

<b>Table 6</b>	
<b>EU #</b>	<b>Reporting Requirements</b>
EU-C1, EU-C4	<p>1) In the event of any PCD1 malfunction, immediately notify the Department by telephone and subsequently in writing within seven days of said occurrence. This written notification shall indicate the cause of the malfunction and the steps taken to prevent similar malfunctions from occurring in the future, as referenced in Approval MBR-89-IND-290, Proviso No. 8.</p> <p>2) At least 30 days prior to testing PCD1, submit a pretest protocol to the Department for review and written approval. Within 90 days of the completion of the stack testing, submit results of the testing to the Department for review and written Department approval, as referenced in the Stack Test Approval for Approval MBR-89-IND-290 issued by MassDEP on December 28, 2011.</p>
EU-C1, EU-C4, EU-C5, EU-E1, EU-E2	<p>3) Reports verifying compliance with the daily bubble limit established in Table 3 of this Permit shall be filed with the Department on a monthly basis, on or before the 15<sup>th</sup> of the following month. Said reports shall include the total gallons of solids applied on the casting lines and total gallons of solids applied on the finishing lines, both on a 24 hour basis (3:00 am to 3:00 am), as well as the allowable daily VOC emissions based on solids applied and the actual daily VOC emissions as referenced Approval MBR-86-BUB-010, Proviso No. 2.</p>
EU-C1, EU-C4, EU-E1, EU-E2	<p>4) In accordance with 40 CFR Section 63.830 (Subpart KK; Printing and Publishing Industry), comply with all applicable reporting requirements as required therein. In accordance with 63.830(b)(6), submit a semi-annual summary report which shall include exceedances of the applicable standard of 0.2 kg HAPs applied to kg solids applied.</p>
EU-C1, EU-E1, EU-E2, EU-C2K, EU-URE, EU-INK	<p>5) In accordance with 40 CFR Sections 63.4310 – 63.4311 (Subpart OOOO; Printing, Coating and Dyeing of Fabrics and Other Textiles), comply with all applicable reporting requirements as required therein.</p>

<b>Table 6</b>	
<b>EU #</b>	<b>Reporting Requirements</b>
EU-E2	6) In accordance with 40 CFR Sections 63.5420 (Subpart TTTT; Leather Finishing Operations), comply with all applicable reporting requirements.
EU-C5	7) In accordance with 40 CFR Sections 63.3400 (Subpart JJJJ; Paper and Other Web Coating), comply with all applicable reporting requirements. In particular, submit a semi-annual compliance report for each period ending on June 30 and December 31 in accordance with 63.3400(c)(1) and 63.3400(c)(2) . Each compliance report shall be postmarked or delivered no later than July 31 or January 31 of each subsequent period.
EU-C2K	8) At least thirty (30) days prior to the commencement of compliance testing of PCD2, submit a test protocol to this office for review and written Department approval. This protocol shall describe the test methodologies to be employed during the required compliance testing. As referenced in Approval MBR-98-IND-028, Proviso No. D.5, a final compliance test results report must be submitted to this Office, attention Permit Chief for the Bureau of Air and Waste, within sixty (60) days of completion of the required compliance testing.
	9) A copy of any subsequent revisions made to PCD2's SOMP must be submitted to this Office within seven (7) days of the modification(s) as referenced in Approval MBR-98-IND-028, Proviso D.8.
	10) A semi-annual report of the VOC and HAPs emissions data for the period of January 1 through June 30 inclusive and for the period of July 1 through December 31 inclusive must be submitted to the Department, attention Permit Chief for the Bureau of Air and Waste, by no later than July 31 and January 31, respectively, of each year, as referenced in Approval MBR-98-IND-028, Proviso D.12.
	11) Submit quarterly reports to the EPA documenting all 3 hour periods during which the average total enclosure monitor readings vary by 5 percent or more from the average value measured during the most recent performance test as referenced in 40 CFR 60.747(d)(6) of NSPS Subpart VVV, incorporated herein by reference. If no reportable periods have occurred, submit semiannual statements clarifying this fact to the EPA as referenced in 40 CFR 60.747(d)(7). Said reports shall be postmarked within 30 days of the end of the reporting period as referenced in 40 CFR 60.747(g), incorporated herein by reference. In accordance with 60.747(h), these records shall be retained for at least 2 years.
	12) In accordance with Approval MBR-05-IND-004, the Permittee shall report the resulting emissions from PCD3 on subsequent Emission Statement Forms as required by 310 CMR 7.12.
	13) In accordance with MBR-05-IND-004, the Permittee shall notify MassDEP by fax within one business day if a cleaning of PCD2 is required prior to its next scheduled quarterly cleaning as a result of discovery of visible particulate matter during the required daily inspections of the area surrounding PCD2 and PCD3.
EU-C1, EU-C2K, EU-URE, EU-INK	14) Submit quarterly or semi-annual reports to the EPA documenting all 3 hour periods during which the average combustion temperature of PCD1 and/or PCD2 is 28°C below the 3-hour average combustion temperature of the device during the most recent performance test as referenced in 40 CFR 60.747(d)(4), incorporated herein by reference. In addition, submit all periods during actual coating or mixing operations when a required monitoring device and/or control device was malfunctioning or not operating as referenced in 40 CFR 60.774(f)(1) and (2), incorporated herein by reference. If no reportable periods have occurred, submit semiannual statements clarifying this fact to the EPA as referenced in 40 CFR 60.747(d)(7). Said reports shall be postmarked within 30 days of the end of the reporting period as referenced in 40 CFR 60.747(g), incorporated herein by reference.
Facility-Wide	15) In accordance with 310 CMR 7.00: Appendix C (10)(d), submit, upon request, the test results of any other testing or testing methodology required by the Department or EPA.
	16) Submit a report each year which describes the Permittee's progress towards lowering overall air emissions as required by Approval MBR-89-IND-290, Proviso No. 6 and Approval MBR-98-IND-028, Proviso No. E.5. Said report shall be due annually on or before April 15 of the following year as referenced in Approval MBR-98-IND-028, Proviso No. E.5.



<b>Table 6</b>	
<b>EU #</b>	<b>Reporting Requirements</b>
Facility-Wide (Continued)	17) Upon the Department's request, any record relative to the Operating Permit or to 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, and 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.
	18) Submit by January 30 and July 30 for the previous six months respectively, a summary of all monitoring data and related supporting information to the Department as required by 310 CMR 7.00: Appendix C(10)(c). (Please also see General Condition No. 10 of this Permit).
	19) Promptly report to the Department all instances of deviations from Permit requirements by telephone or fax, within three days of discovery of such deviation, as provided in 310 CMR 7.00: Appendix C(10)(f), incorporated herein by reference.
	20) Submit an Annual Compliance report, annually by January 30, to MassDEP and EPA as required by General Condition No.10 of this Permit.
	21) All required reports must be certified by a responsible official as provided in 310 CMR 7.00:Appendix C(10)(h) incorporated herein by reference.
	22) On an annual basis, register on a form obtained from the Department such information as the Department may specify including: <ul style="list-style-type: none"> <li>a) the nature and amounts of the emissions from the Facility,</li> <li>b) information which may be needed to determine the nature and amounts of emissions from the facility, and</li> <li>c) any other information pertaining to the facility which the Department requires as provided in 310 CMR 7.12 incorporated herein by reference.</li> </ul>
	23) In accordance with 310 CMR 7.71(5), by April 15, 2010 and April 15 of each year thereafter report emissions of greenhouse gases from stationary emissions sources including, but not limited to, emissions from factory stacks, manufacturing processes and vents, fugitive emissions, and other process emissions; and owned or leased motor vehicles when stationary source greenhouse gas emissions are greater than 5,000 short tons CO <sub>2</sub> e. Report greenhouse gas emissions electronically in a format that can be accommodated by the registry. (State only requirement)
	24) In accordance with 310 CMR 7.71(6), certify greenhouse gas emissions reports using a form provided by the Department or the registry. (State only requirement)
25) In accordance with 310 CMR 7.71(7), by December 31 <sup>st</sup> of the applicable year submit to the Department documentation of triennial verification of the greenhouse gas emissions report. (State only requirement)	

**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, contained in Table 7 below:

<b>Table 7</b>	
<b>Regulation</b>	<b>Reason</b>
310 CMR 7.16	Below the thresholds

**5. SPECIAL TERMS AND CONDITIONS**

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

<b>Table 8</b>	
<b>EU#</b>	<b>Special Terms and Conditions</b>
EU-C1, EU-C4, EU-C5, EU-E1, EU-E2	<p>1) As per 310 CMR 7.00: Appendix B(4)(f)(2), MassDEP has determined that Approval MBR-86-BUB-010 shall be renewed. As such and as referenced in 310 CMR 7.00: Appendix B(4)(e)1, the Permittee shall continue to perform the following daily bubble calculations to determine compliance with their 24-hour bubble emission limit (bubbled for EU-C1, EU-C4, EU-C5, EU-E1 and EU-E2):</p> <p>In order to comply with a bubble for VOC, the combined actual emissions (AcE) over a daily period from all emission units in the bubble must be less than or equal to the allowable emission total (AIE) as determined by the following equations:</p> <p> <math>AcE = (Ac_1 \times B_1) + (Ac_2 \times B_2)</math>  <math>AIE = (A_1 \times B_1) + (A_2 \times B_2)</math> </p> <p>where: AcE = the combined <u>actual</u> VOC emissions from the facility in pounds per day                      AIE = the <u>allowable</u> VOC emissions from the facility in pounds per day                      Ac<sub>1</sub> = the actual emission rate in pounds of VOC per gallon of solids applied on EU-C1, EU-C4 and EU-C5 per day                      Ac<sub>2</sub> = the actual emission rate in pounds of VOC per gallon of solids applied for EU-E1 and EU-E2 per day                      B<sub>1</sub> = the actual number of production units processed each day in gallons of solids applied on EU-C1, EU-C4, and EU-C5                      B<sub>2</sub> = the actual number of production units processed each day in gallons of solids applied on EU-E1 and EU-E2                      A<sub>1</sub> = 4.8 pounds of VOC per gallon solids applied (which is the most stringent emission limit for EU-C1, EU-C4, and EU-C5)                      A<sub>2</sub> = 7.8 pounds of VOC per gallon solids applied (which is the most stringent emission limit for EU-E1 and EU-E2)</p>

EU-C1, EU-C4	<p>2) All of the captured VOC and HAP emissions from EU-C1 and EU-C4 shall be directed to PCD1 for control as referenced in Approval MBR-89-IND-290, Proviso No.9. All of the coating stations associated with EU-C1 are equipped with permanent total enclosures (PTEs) while only coating stations 1 and 2 of EU-C4 are equipped with PTEs. Coating stations 3 and 4 of EU-C4 were never equipped with PTEs since the materials that are applied on these two coating stations have low vapor pressures such that the VOC and HAPs only volatilize in the drying ovens associated with stations 3 and 4. All of the coating stations for EU-C1 and EU-C4 have associated drying ovens and these ovens are also PTEs that capture and direct the VOC and HAPs emissions to PCD1 for control.</p> <p>3) A minimum PCD1 combustion chamber temperature of 1400 degrees Fahrenheit shall be achieved prior to start-up of lines EU-C1 and EU-C4 and shall be maintained at all times during lines EU-C1 and EU-C4 coating operations. The operation of coating lines EU-C1 and EU-C4 shall be interlocked with PCD1 to insure that no coating shall be performed unless the oxidizer temperature is at least 1400 degrees Fahrenheit as referenced in Approval MBR-89-IND-290, Proviso No.11.</p> <p>4) Casting line Nos. EU-C1 and EU-C4 shall not be operated unless PCD1's temperature recording equipment is fully operational as referenced in Approval MBR-89-IND-290, Proviso No. 12.</p> <p>5) The Permittee shall only apply coatings with a vapor pressure <math>\leq 0.01</math> mm Hg @ 25°C on coating stations No. 3 and No. 4 of EU-C4 as reference in the Permittee's CAM Plan. The Permittee shall maintain on-site records documenting the coatings applied on coating stations No. 3 and No. 4 of EU-C4 comply with the vapor pressure requirement of B4) above.</p> <p>6) The Permittee shall report any deviations of a coating having a vapor pressure <math>&gt; 0.01</math> mm Hg @ 25°C which were applied on coating stations No. 3 and No. 4 of EU-C4 via the semi-annual reports required in Table 6, item 18.</p>
EU-C1, EU-C4, EU-E1, EU-E2	<p>7) EU-C1, EU-C4, EU-E1, and EU-E2 are subject to the requirements of 40 CFR 63.1 – 15, Subpart A, "General Provisions" as indicated in Table 3 to Subpart KK of 40 CFR 63. Compliance with all applicable provisions therein is required.</p>
EU-C1, EU-C2K, EU-E1, EU-E2, EU-URE, EU-INK	<p>8) EU-C1, EU-C2K, EU-E1, EU-E2, EU-URE, and EU-INK are subject to the requirements of 40 CFR 63.1 – 15, Subpart A, "General Provisions" as indicated in Table 3 to Subpart OOOO of 40 CFR 63. Compliance with all applicable provisions therein is required.</p>
EU-E2	<p>9) EU-E2 is subject to the requirements of 40 CFR 63.1 – 15, Subpart A, "General Provisions" as indicated in Table 3 to Subpart TTTT of 40 CFR 63. Compliance with all applicable provisions therein is required.</p>
EU-C5	<p>10) EU-C5 is subject to the requirements of 40 CFR 63.1 – 15, Subpart A, "General Provisions" as indicated in Table 3 to Subpart JJJJ of 40 CFR 63. Compliance with all applicable provisions therein is required.</p>
EU-C2K	<p>11) All of the process air from EU-C2K shall be vented to PCD2 for abatement as referenced in Approval MBR-98-IND-028, Proviso No. C.4.</p> <p>12) That an electronic interlock system shall prevent EU-C2K from operating until PCD2 achieves a minimum oxidizer chamber temperature of 1310 °F. The electronic interlock system shall also prevent the coating line from operating if PCD2's combustion chamber temperature falls below 1310°F or exceeds 1800 °F.</p> <p>13) As referenced in Approval MBR-98-IND-028, Proviso No. D.6, maintain documentation and adhere to the criteria for VOC capture efficiency - U.S. EPA Method 204 for permanent total enclosures (PTE) for EU-C2K. The criteria for a PTE are the following:</p> <ul style="list-style-type: none"> <li>a) All access doors and windows 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 natural draft openings (NDOs) must be greater than 200 feet per minute.</li> </ul>

<p>EU-C2K (Continued)</p>	<p>d) Sources of VOC in the PTE must be at least four (4) equivalent diameters from each NDO.</p> <p>e) The total area of all NDOs must be less than five (5) percent of the total area of the enclosure.</p>
	<p>14) As referenced in Approval MBR-05-IND-004, the Permittee shall immediately cease operation in the event of any upset or malfunction to PCD3, which results in excess emissions to the air and/or a condition of air pollution, until the problem has been corrected. The Northeast Regional Office shall be notified by fax within one business day, and subsequently in writing within seven days, of any said occurrence, attention Bureau of Air and Waste, Compliance and Enforcement Chief. The written confirmation shall describe the malfunction and the corrective action taken, the possible reasons for the malfunction, the dates and times the malfunction occurred and corrective actions initiated, the dates and times corrective actions were completed and the emission unit returned to compliance, and future actions to be undertaken to prevent the malfunction from recurring. A record of all such information pertaining to malfunctions shall also be made available to Department personnel upon request.</p>
	<p>15) As referenced in Approval MBR-05-IND-004, The Permittee shall provide adequate lighting to accommodate routine night maintenance of all air pollution control equipment.</p>
	<p>16) As referenced in Approval MBR-05-IND-004, The Permittee shall have readily accessible at all times at least thirteen (13) replacement bags for the baghouse, PCD3.</p>
<p>EU-URE</p>	<p>17) Automatic isolation valves in the ductwork will allow exhaust air from the mixers to be directed to either PCD1 or PCD2. The valves will be interlocked to the combustion temperatures of PCD1 and PCD2. When the combustion chamber temperature drops below the compliance level, the valves will close to the PCD unit that is below the compliance level. If both temperatures are below their respective compliance level, the exhaust motor is stopped and the mixers motors are stopped.</p>
<p>Facility-wide</p>	<p>18) Should any nuisance condition be generated at the Facility, then appropriate steps shall immediately be taken to abate said nuisance condition(s). (State only requirement - 310 CMR 7.01 General Regulations to Prevent Air Pollution).</p>
	<p>19) Any net VOC emissions increase occurring over a period of five consecutive calendar years which equates to 25 or more tons of VOC shall become subject to Nonattainment Review, as per the requirements of 310 CMR 7.00: Appendix A.</p>
	<p>20) The Permittee shall continue to evaluate and utilize low and no VOC coatings and clean-up solutions which are technically and economically feasible in accordance with 310 CMR 50 (Toxic Use Reduction) as referenced in Approval MBR-98-IND-028, Proviso No. D. 11.</p>

**6. ALTERNATIVE OPERATING SCENARIOS**

<b>Table 9</b>
<b>Alternative Operating Scenarios</b>
The Permittee did not request alternative operating scenarios in its Operating Permit Renewal Application.

**7. EMISSIONS TRADING**

<b>Table 10</b>	
<b>EU#</b>	<b>Emissions Trading</b>
Facility-wide	(a) Intra-facility emissions trading  The Permittee did not request intra-facility emissions trading in its Operating Permit Renewal Application.
	(b) Inter-facility emissions trading  The Permittee did not request inter-facility emissions trading in its Operating Permit Renewal 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 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, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

### A. Annual Compliance Report and Certification

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

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 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 the MassDEP. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status during the reporting period;

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

## **11. 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), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22, 7.70 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A

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

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

### **14. PERMIT TERM**

This Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date 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**

- A. 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:
- B. 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;
- C. have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- D. inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- E. 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 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, fax or electronic mail (e-mail), within three (3) days of discovery of such deviation:

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

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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 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.

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

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the MassDEP Bureau of Air and Waste Air Operating Permit Reporting Kit, which is available to the Permittee via the MassDEP's web site,

<http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

This report shall include the deviation, including those attributable to upset conditions as defined in the Permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone, 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 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".

## **29. PREVENTION OF ACCIDENTAL RELEASES**

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

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

## **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.