Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
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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"]:
Interprint, Inc.
101 Central Berkshire Boulevard
Pittsfield, MA 01201

INFORMATION RELIED UPON:
Application No. WE-17-007
Transmittal No. X274107
OP Minor Modification No. WE-19-025
Transmittal No. X283983

FACILITY LOCATION:
Interprint, Inc.
101 Central Berkshire Boulevard
Pittsfield, MA 01201

FACILITY IDENTIFYING NUMBERS:
AQ ID: 1170013
FMF FAC NO.: 414411
FMF RO NO.: 430714

NATURE OF BUSINESS:
Commercial Gravure Printing

Standard Industrial Classification (SIC): 2754
North American Industrial Classification System (NAICS):323111

RESPONSIBLE OFFICIAL:
Name: Roland M. Morin
Title: Managing Director

FACILITY CONTACT PERSON:
Name: Mark Wasnewsky
Title: Environmental Process Manager
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This Operating Permit shall expire on 12/7/2023.
For the Department of Environmental Protection, Bureau of Waste Prevention

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

12/4/2019

Michael Gorski
Regional Director
Department of Environmental Protection
Western Regional Office

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.

A. DESCRIPTION OF FACILITY AND OPERATIONS – (Non-Exempt Activities)

On August 19, 2019, MassDEP received an Operating Permit Minor Modification Application #WE-19-025 from Interprint, Inc. The Application was submitted to incorporate a new rotogravure printing press, identified as Emission Unit #19, a new electron beam (EB) coating system, identified as Emission Unit #20, a new corona surface treatment device (corona treater) with a catalytic ozone decomposer, identified as Emission Unit #21, new and existing printing press floor cleaning operations, identified as Emission Unit #22 and new and existing EB coating system cleaning operations, identified as Emission Unit #23. Each of the new emission units are described in the following paragraphs.

Emission Unit #19 consists of a Faustel Rotogravure 5-Station Printing Press (Film Machine-1), associated raw materials storage, conveying and mixing tanks. The printing press has a maximum printing width of 83.86 inches and a maximum process speed of 250 meters of oriented polypropylene (OPP) film/ polyvinyl chloride (PVC) film per minute. Emission Unit #19 will be used for printing on OPP film and PVC film substrates to produce Premeer Décor and LVT products, respectively. The drying technology will use NIR technology instead of fossil fuel combustion. EU #19 will be operated in conjunction with the new EB coating system (Emission Unit #20) and the new corona surface treatment device (Emission Unit #21) or it will be run independently. This printing operation is considered product and packaging rotogravure printing. Emission Unit #19 operates pursuant to Plan Approval #WE-18-020, issued 8/15/19 and is subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry).

Emission Unit #20 consists of a Faustel offset gravure coater, an EB curing unit and associated raw materials storage, conveying and mixing tanks. The EB curing unit will be comprised of an ESI EZcure Model 125/60/800 side fire accelerator with a Selfshield Model SF 125/165 chill roll type product handler. Emission Unit #20 will have a maximum coating width of 65 inches (1.65 meters) with a maximum run speed of 250 meters of printed OPP film per minute. The EB coating system will be installed in-line with the new Faustel rotogravure printing press (Emission Unit #19). Once Emission Unit #19 has printed on the OPP film, the offset gravure coater will apply a coating to the OPP film. Then the OPP film will pass through the EB curing unit to activate and

cure the coating to its dried and finished state. Emission Unit #20 operates pursuant to Plan Approval #WE-18-020, issued 8/15/19.

Emission Unit #21 consists of a new corona surface treatment device (corona treater) with a catalytic ozone decomposer which is a Enercon Industries Corporation ES011E2-200 "H" treater station controlled with a Enercon Ozone-EX Decomposition Systems, Model 03X-12 that is in-line with Emission Unit #19. The purpose of the corona surface treatment device is to remove oils from and increase the surface tension of the substrate which enhances the adhesion of inks. The corona treater emits ozone which is controlled by the catalytic ozone decomposer. The Enercon Ozone-EX Decomposition Systems, Model 03X-12 is a catalytic ozone decomposer used to convert ozone in the air stream to oxygen. The unit is designed to reduce input ozone levels up to 300 parts per million mass basis to less than 0.1 parts per million mass basis at the outlet. Therefore, the Corotec UNI-50 with a Corotec Nozone System is exempt from the plan approval requirements of 310 CMR 7.02 since it is subject to and complies with the requirements of 310 CMR 7.03(21).

Emission Unit #22 consists of the facility-wide printing press floor cleaning operations which include the floor cleaning activities in the vicinity of Emission Unit #19 as well as in the vicinity of the existing printing presses which are Emission Unit #1 and #2. Emission Unit #19 operates pursuant to Plan Approval #WE-18-020, issued 8/15/19.

Emission Unit #23 consists of the EB coating system cleaning operations, which include the cleaning of Emission Unit #20 and Emission Unit #5. The cleaning operations for Emission Unit #9 are not included in Emission Unit #23 since those cleaning operations have previously received plan approval (PA #WE-14-022, issued March 31, 2014 and administratively amended June 6, 2014). Emission Unit #23 operates pursuant to Plan Approval #WE-18-020, issued 8/15/19.

Interprint designs and prints decorative paper, oriented polypropylene (OPP) film, polyvinyl chloride (PVC) film as well as coats OPP film which is used as the design layer in laminate surfaces such as countertops, flooring, furniture, and store fixtures. Interprint began operation at their existing facility on Central Berkshire Boulevard in the summer of 2005. Interprint operates three primary sources of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions at their facility which are the production printing presses and associated electron beam coater, lab printing presses and laminating process which are described in the following paragraphs. Other air contaminant sources at the facility which have applicable requirements are the hard chromium electroplating process and the 33 kilowatt propane-fired emergency generator**.** Interprint has restricted their annual facility-wide VOC and HAP emission rates to below the major source thresholds associated with the Operating Permit and Compliance Program regulations of 310 CMR 7.00: Appendix C.

The facility is currently not a major source since it does not have the potential to emit major quantities of any applicable air contaminant. Additionally, the facility established emission caps to limit the facility-wide emissions of VOCs, any combination of HAPs and any single HAP in Plan Approval 1-P-11-008, issued September 29, 2011. However, the USEPA had determined

prior to the establishment of the facility-wide VOC and HAP emission limits contained in the September 2011 plan approval that the facility was a major source under the National Emission Standards for Hazardous Air Pollutants (NESHAPs) and "once in always in". By being a major source under the NESHAPs, Interprint is subject to the Operating Permit and Compliance Program pursuant to 310 CMR 7.00: Appendix C(2).

Production Printing Presses – Emission Unit #1
Interprint operates five (5) production rotogravure printing presses for production purposes using water-based inks which contain VOCs and HAPs. This printing operation is considered product and packaging rotogravure printing. The production printing presses operate pursuant to Plan Approval #1-P-11-008, dated 9/29/11 and are subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry), the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. and 310 CMR 7.00: Appendix A.

The printing lines are each equipped with drying ovens which fire natural gas at a maximum heat input capacity of 3.17 million British thermal units per hour (MMBtu/hr) for Machine 1 (M-1), 3.17 MMBtu/hr for Machine 2(M-2), 3.17 MMBtu/hr for Machine 3(M-3), 5.89 MMBtu/hr for Machine 4(M-4) and 12.7 MMBtu/hr for Machine 6(M-6). Any fuel burning equipment ≥ 3 MMBtu/hr heat input will be subject to the requirements of 310 CMR 7.04(4)(a) *Inspection, Maintenance and Testing*.

Emissions from each of the production printing presses vent to two emission points.

Lab Printing Presses – Emission Unit #2
Interprint operates three (3) lab rotogravure printing presses that are used to perform design development of decorative prints and are infrequently used for production purposes. The lab printing presses are used to produce approximately 0.1% of the printed product made at the facility and are otherwise used to conduct research into new products. As a result, the lab printing presses are considered to qualify as research and laboratory equipment. 40 CFR Part 63, Subpart KK does not apply to research or laboratory equipment [63.820(b)], which is defined as:

> Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Since the lab printing presses are used to make only a de minimis amount of product for sale, the three lab printing presses meet the definition of research or laboratory equipment and are not subject to 40 CFR Part 63, Subpart KK. However, the lab presses operate pursuant to Plan Approval #1-P-11-008, dated 9/29/11, Plan Approval #1-P-11-013, dated 10/26/11 and are subject to the BACT requirements of 310 CMR 7.02(8)(a)2. and 310 CMR 7.00 Appendix A.

Lab Printing Press #2; Kochsiek Model No. 88, which was approved in Plan Approval #1-P-11-008, was replaced with a similar lab press (Lab Printing Press #4; Kochsiek Model No. 212H)

pursuant to Plan Approval #1-P-11-013, dated 10/26/11.

Lab press machine 1(L-1) is equipped with a drying oven that is heated by a natural gas-fired hot oil system with a maximum 1.5 MMBtu/hr heat input rating. Lab press machine 3 and 4 (L-3 and L-4) are each equipped with drying ovens that are heated with natural gas at a maximum heat input capacity of 1.28 MMBtu/hr and 1.5 MMBtu/hr. Each lab printing press vents to its own stack.

Laminating Process – Emission Unit #3
In the laminating process, samples of printed paper are laminated as part of the quality control process to check the color and design of customers' final products. The size of the typical printed sample ranges from 12 inch (in.) by 12 in. to 20 in. by 20 in. Individual samples of printed paper are laminated in a non-continuous, batch process.

The laminating process equipment, identified as Emission Unit #3, consists of six laminating presses and three electric drying ovens. Four of the laminating presses are heated by a 1.5 MMBtu/hr natural gas-fired hot oil system which is also used for the drying oven on Lab Press 1. The other two laminating presses are heated electrically. The laminating process operates pursuant to Plan Approval #1-P-11-008, dated 9/29/11 and is subject to the BACT requirements of 310 CMR 7.02(8)(a)2. and 310 CMR 7.00: Appendix A.

In addition, the Facility constructed five laminating presses since the issuance of Title V Operating Permit #1-O-08-006 on November 2, 2012. The five laminating presses are the:

- Wickert press, Model WKP4350 S with an electric drying oven, also known as LP 7, constructed during 2012.
- Wickert high-pressure hydraulic press, Model WKP 4 350 S with an electric drying oven, also known as LP 8. The facility notified MassDEP of their intent to construct this source in a letter dated July 17, 2014.
- Wabsah low-pressure hydraulic press, Model 50-15-2TM with an electric drying oven, also known as LP 9. The facility notified MassDEP of their intent to construct this source in a letter dated February 3, 2015.
- Wabash low-pressure hydraulic press, Model 50-15-2TM with an electric drying oven, also known as LP 10. The facility notified MassDEP of their intent to construct this source in a letter dated February 3, 2015.
- Wickert press, Model 4350S with an electric drying oven, also known as LP 11. The facility notified MassDEP of their intent to construct this source in a letter dated September 27, 2017.

The laminating presses 7, 8, 9, 10 and 11 are mentioned here for informational purposes because each of them are exempt from the Plan Approval requirements of 310 CMR 7.02 pursuant to 310 CMR7.02(2)(b)7. and are not otherwise subject to an applicable requirement. Therefore, LP 7, 8, 9 10 and 11 are exempt activities according to the operating permit program regulation, 310 CMR 7.00: *Appendix C* (5)(h) and will not be listed as emission units in the operating permit.

Hard Chromium Electroplating Process – Emission Unit #4
Interprint conducts hard chromium electroplating of cylinders used on rotogravure printing lines. The process involves four tanks: a chromium stripping tank, a degreasing tank, a chromium electroplating tank, and a polishing tank. The chromium electroplating tank has a rectifier capacity of 13,000 ampere and is vented first to a mist eliminator and then to a multi-stage composite mesh pad (CMP) with a final stage HEPA filter. The chromium electroplating operation is considered a large, hard chromium electroplating operation. The chromium electroplating operation was constructed and operated prior to the facility establishing caps to formally limit HAP emissions to below major source thresholds and prior to the first substantive requirement of the NESHAP. Therefore, the chromium electroplating tank is considered by EPA to be located at a major source of HAP and subject to the regulations at 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).

Pursuant to 40 CFR 63.340(c), process tanks associated with a chromium electroplating process, but in which chromium electroplating does not take place, are not subject to Subpart N. Therefore, the chromium stripping, degreasing and polishing tanks are not part of the affected source; only the chromium electroplating tank is subject to Subpart N.

In accordance with 40 CFR Part 63 Subpart N, the facility conducted an initial performance test on December 20, 2006. The stack test results for the chromium electroplating tank were submitted in a report dated January 29, 2007 and indicated a chromium emission rate of 0.0005 milligram per dry standard cubic meter (mg/dscm), which is less than the allowable total chromium emission rate of 0.011 mg/dscm. In addition, the facility established a process operating parameter for the CMP which was a pressure drop of 2.7 inches of water column across all the stages. A pressure drop across the mist eliminator was established at 0.4 inches of water column.

The allowable total chromium emission rate for hard chromium electroplating tanks that are existing affected sources and located at large hard chromium electroplating facilities was lowered by the USEPA on September 19, 2012, from 0.015 mg/dscm to 0.011 mg/dscm. The operating permit has been updated to reflect the current total chromium emission rate.

Electron Beam Coating System – Emission Unit #5 and #9
The electron beam coating system, identified as Emission Unit #5, consists of a Faustel Offset Coater (Model No. 3110) and an ESI Electron Beam Cure unit (Model EZ 125/165/800), both of which are installed in-line with production Press M-3. The electron beam coating system applies a finish coating to an oriented polypropylene (OPP) film that is printed by the Production Press M-3. The electron beam coating system operates pursuant to Plan Approval #1-P-11-014, dated 10/21/11.

The electron beam coating system, identified as Emission Unit #9, consists of a Faustel MCL 3 Roll Offset Gravure Coater and an EB curing unit which is comprised of an ESI EZcure I Model 125/60/750 with a Selfshield Model SF 125/750. The offset gravure coater applies an EB coating to the OPP film that is printed by the Giave/5E-700 Rotogravure Lab Press, also known as Lab

Press 3. Cleanup solvents, which contain volatile organic compounds, are applied to the equipment by hand using rags. The EB coating system operates pursuant to Plan Approval #WE-14-002, dated 6/6/14.

Propane-Fired Emergency Engine/Generator (33 electrical kilowatts) – Emission Unit #6
The emergency engine/generator is rated at 33 electrical kilowatts of output (approximately 0.5 MMBtu/hr heat input rate burning propane). The emergency engine/generator was installed before June 12, 2006 (installed in 2004) and prior to the facility establishing caps to formally limit HAP emissions to below major source thresholds. However, the facility's HAP emissions were limited to below major source thresholds prior to the date (October 19, 2013) of the first substantive requirement in 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Therefore, the propane-fired emergency generator is an existing spark ignition engine (installed before June 12, 2006) located at an area source of HAP. It is subject to 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

On May 4, 2016, the U.S. Court of Appeals for the District of Columbia Circuit issued a mandate for the vacatur of Subpart ZZZZ, paragraphs 40 CFR Part 63.6640(f)(2)(ii)-(iii). The vacated paragraphs specified that emergency engines may operate for a limited number of hours per year in two situations: (1) emergency demand response when the Reliability Coordinator has declared an Energy Emergency Alert Level 2, and (2) when there is a deviation of voltage or frequency of five percent or greater below standard voltage or frequency. Upon issuance of the court's mandate to vacate 40 CFR Part 63.6640(f)(2)(ii)-(iii), these provisions currently have no legal effect. Therefore, these regulations have been removed from this operating permit.

Miscellaneous Combustion Units Greater Than 3 MMBtu/hr – Emission Unit #7
In addition to the propane-fired units used in the printing process, natural gas-fired heaters are used for comfort heating in the production areas and offices. These two units are the North End natural gas-fired Air Rotation Unit and the South End natural gas-fired Air Rotation Unit and are identified as Emission Unit #7. Both of these units have a maximum heat input capacity of 3 MMBtu/hr.

Any fuel burning equipment ≥ 3 MMBtu/hr heat input will be subject to the requirements of 310 CMR 7.04(4)(a) *Inspection, Maintenance and Testing*.

Corona Treater – Emission Unit #8, #10 and #11
The Corona Surface Treatment Device (Corona Treater), identified as Emission Unit #8, is manufactured by Enercon Industries Corporation and is installed on Production Printing Press #3. Its purpose is to remove oils from a film substrate, increasing surface tension of the substrate and enhancing the adhesion of inks. The air flow through the corona treater will be vented to a catalytic ozone decomposer that will reduce an input ozone level of up to 150 ppm to less than 0.1 ppm. The Corona Treater is subject to the requirements of 310 CMR 7.03(21).

Emission Unit #10 consists of a Corotec UNI-50 corona treater with a Corotec Nozone System that

is in-line with Lab Press 3. The purpose of the corona surface treatment device is to remove oils from and increase the surface tension of the substrate which enhances the adhesion of inks. The Corotec UNI-50 emits ozone which is controlled by the Corotec Nozone System. The Corotec Nozone System is a catalytic ozone decomposer used to convert ozone in the air stream to oxygen. The unit is designed to reduce input ozone levels up to 300 parts per million mass basis to less than 0.1 parts per million mass basis at the outlet. The Corotec UNI-50 with a Corotec Nozone System is subject to the requirements of 310 CMR 7.03(21).

Emission Unit #11 consists of a Corotec Model HFT-100 corona treater with a Corotec Nozone System that is in-line with Rotogravure Production Press M-4. The purpose of the corona surface treatment device is to remove oils from and increase the surface tension of the substrate which enhances the adhesion of inks. The Corotec Model HFT-100 emits ozone which is controlled by the Corotec Nozone System. The Corotec Nozone System is a catalytic ozone decomposer used to convert ozone in the air stream to oxygen. The unit is designed to reduce input ozone levels up to 300 parts per million mass basis to less than 0.1 parts per million mass basis at the outlet. The Corotec Model HFT-100 with a Corotec Nozone System is subject to the requirements of 310 CMR 7.03(21).

<u>Massachusetts Greenhouse Gas Reporting Program</u>
The Permittee is subject to the requirements of Greenhouse Gas Emissions Reporting as defined by MassDEP in 310 CMR 7.71(3)(a).
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_2, CH_4, N_2O, SF_6, hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

2. EMISSION UNIT IDENTIFICATION

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

Table 1a

EU	Description of EU	EU Design Capacity	Pollution Control Device (PCD)
1	Rotogravure Production Press M-1 Kochsiek/502 and Eclipse, 40 RAH/ Natural gas –Fired Drying Oven	24,000 square meter/hour /3.17 MMBtu/hr	None
	Rotogravure Production Press M-2 Kochsiek/502D and KAG, LB-100N/ Natural gas -Fired Drying Oven	28,800 square meter/hour /3.17 MMBtu/hr	
	Rotogravure Production Press M-3 Kochsiek/502D and KAG, LB-100N/ Natural gas -Fired Drying Oven	28,800 square meter/hour /3.17 MMBtu/hr	
	Rotogravure Production Press M-4 Kochsiek/4153 and KWG, LB-300-N/ Natural gas -Fired Drying Oven	49,140 square meter/hour /5.89 MMBtu/hr	
	Rotogravure Production Press M-6 Kochsiek/4153 and Venti Oelde, VR40-900/ Natural gas -Fired Drying Oven	73,710 square meter/hour /12.7 MMBtu/hr	
2	Rotogravure Lab Press L-1 Kochsiek/85 /Drying oven (heated by a GTS 1.5 MMBtu/hr Natural gas -fired hot oil system)	3,600 square meter/hour	None
	Rotogravure Lab Press L-3 Giave/5E-700 / Natural gas - Fired Drying Oven	3,600 square meter/hour/1.28 MMBtu/hr	
	Rotogravure Lab Press L-4 Kochsiek//212H / Natural gas - Fired Drying Oven	5,760 square meter/hour/1.5 MMBtu/hr	
3	Laminating Room containing: 6 Presses (4 of the 6 presses are heated by a GTS 1.5 MMBtu/hr Natural gas -fired hot oil system), 3 Electric Drying Ovens and Resin Mixing	96 laminates/hour	None
4	Hard Chromium Electroplating Process	Rectifier Capacity=13,000 ampere	Mist eliminator and multi-stage composite mesh pad with a final stage HEPA filter
5	Electron Beam Coating System – Faustel 3110(Coater) ESI EZ 125/165/800 (Electron Beam Cure)	175 meters of printed OPP film/minute	None
6	Propane-fired Emergency Stationary Reciprocating Internal Combustion Engine	33 kilowatts of output (0.5 MMBtu/hr of heat input)	None
7	North End, Johnson AR-85-DE-10-MG-F1 Natural gas-fired Air Rotation Unit	3 MMBtu/hr	None
	South End, Johnson AR-85-DE-10-MG-F1 Natural gas-fired Air Rotation Unit	3 MMBtu/hr	
8	Corona Surface Treatment Device	None	catalytic ozone decomposer

Table 1b			
EU	**Description of EU**	**EU Design Capacity**	**Pollution Control Device (PCD)**
9	Electron Beam Coating System (including cleanup operations) consisting of the following equipment: • Faustel MCL 3 Roll Offset Gravure Coater • ESI EZcure I Model 125/60/750 with a Selfshield Model SF 125/750 -Electron Beam Curing Unit	• Maximum 200 meters of printed OPP film per minute • Maximum coating width of 0.6 meters	None
10	Corotec UNI-50 corona surface treatment device	None	Corotec Nozone System (catalytic ozone decomposer)
11	Corotech Model HFT-100 corona surface treatment device	None	Corotec Nozone System (catalytic ozone decomposer)
19	Faustel Rotogravure 5-Station Printing Press (Film Machine-1), associated raw materials storage, conveying and mixing tanks	• Maximum 250 meters of OPP film/ polyvinyl chloride film per minute • Maximum printing width of 83.86 inches (2.13 meters)	None
20	Electron Beam Coating System consisting of the following equipment: • Faustel offset gravure coater • ESI Ezcure Model 125/60/800 side fire accelerator with a Selfshield Model SF 125/165 chill roll type product handler- Electron Beam curing unit • Associated raw materials storage, conveying and mixing tanks	• Maximum 250 meters of printed OPP film per minute • Maximum coating width of 65 inches (1.65 meters)	None
21	Enercon Industries Corporation ES011E2-200 ”H” corona surface treatment device	None	Enercon Ozone-EX Decomposition Systems, Model 03X-12 (catalytic ozone decomposer)
22	Facility-Wide Printing Press Floor Cleaning Operations	NA	None
23	Electron Beam Coating System Cleaning Operations (excluding cleaning operations for EU #9)	NA	None

Table 1a/1b Key:
EU = Emission Unit
MMBtu/hr = million British thermal units per hour
OPP = oriented polypropylene

3. IDENTIFICATION OF EXEMPT ACTIVITIES

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

Table 2

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

4. APPLICABLE REQUIREMENTS

A. OPERATIONAL AND/OR PRODUCTION EMISSION LIMITS AND RESTRICTIONS

The Permittee is subject to the limits/restrictions as contained in Table 3a, 3b, 3c, 3d, 3e below:

Table 3a

EU	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards[1]	Applicable Regulation and/or Approval No
1	Coatings/inks, paper and film	VOC/ Total HAP Single HAP	1. The Permittee shall use coatings with a VOC content no greater than specified in the coating list in Section 5. Special Terms and Conditions, Table 8.	≤49.0 tpy of VOCs in any 12 consecutive month period	PA #1-P-11-008
			2. If the Permittee uses a new coating to replace an existing coating on the coating list in Section 5. Special Terms and conditions, Table 8, the new coating shall have a VOC content no greater than the coating it is replacing.	≤24.5 tpy of total HAPs in any 12 consecutive month period	
			3. If the Permittee develops a new type of coating that does not replace an existing coating, and that has a higher VOC content than its existing coatings on the coating list in Section 5. Special Terms and conditions, Table 8, it will evaluate this new coating (e.g., using its lab printing presses) to document that it has developed the coating with the lowest VOC content possible.	≤9.8 tpy of any single HAP in any 12 consecutive month period	
			4. Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.		40 CFR 63.825(b)
	Natural Gas	Particulate matter	None	Each natural gas-fired drying oven shall not exceed 0.10 lb/MMBtu	Regulation 310 CMR 7.02(8)(h)
		smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)

Table 3b

EU	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards[1]	Applicable Regulation and/or Approval No
2	Coatings/inks, paper and film	VOC/HAP	5. In the development of new designs, the Permittee shall use coatings with a VOC content no greater than specified in the coating list in Section 5. Special Terms and Conditions, Table 8. 6. In processing limited production orders the Permittee shall use coatings with VOC contents no greater than the contents listed in Section 5. Special Terms and Conditions, Table 8. 7. If the Permittee uses a new coating to replace an existing coating, the new coating shall have a VOC content no greater than the coating it is replacing. 8. If, for purposes of new product development, the Permittee develops a new type of coating that does not replace an existing coating listed in Section 5. Special Terms and Conditions, Table 8, and that has a higher VOC content than any of its existing coatings listed in Section 5. Special Terms and Conditions, Table 8, the Permittee shall evaluate such a coating on its lab printing presses and limit emissions from the lab printing presses to the following rates over an 8-hour averaging period. a. Lab Press L-1 shall be limited to 5.3 lb/hr b. Lab Press L-4 shall be limited to 5.3 lb/hr c. Lab Press L-3 shall be limited to 8.5 lb/hr	See Section 5. Special Terms and Conditions, Table 8.	PA #1-P-11-008 and PA#1-P-11-013 (issued 10/26/11)
3	Liquid resin, phenolic core paper and melamine overlay	VOC/HAP	9. No more than 202,176 laminates shall be produced (ranging from 12 x 12 inches to 20 x 20 inches) in any 12 consecutive month period	None	PA #1-P-11-008
4	Chromic acid	Total Chromium	10. In accordance with 40 CFR 63.343(c)(1)(ii), the composite mesh-pad system shall be operated within ±2 inches of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests	≤0.011 milligrams per dry standard cubic meter (4.8×10^{-6}gr/dscf)	40 CFR Part 63, Subpart N

Table 3c

EU	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards[1]	Applicable Regulation and/or Approval No
4	Chromic acid	Chromium	11. In accordance with 40 CFR 63.343(c)(4)(ii), the fiber bed mist eliminator shall be operated within ±1 inches of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.		40 CFR Part 63, Subpart N
5	Coatings/film	VOC	None	≤19,500 pounds/year in any 12 consecutive month period and ≤4,875 pounds/calendar month	PA #1-P-11-014
6	Propane		See Section 5. Special Terms and Conditions, Table 8.		40 CFR Part 63, Subpart ZZZZ
		smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
7	Natural Gas	Particulate Matter	None	Each natural gas-fired unit shall not exceed 0.10 lb/MMBtu	Regulation 310 CMR 7.02(8)(h)
		smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
8 10 11 21	Coatings/film	Ozone	None	Reduce ozone emissions by 99.9% or to an emission limit of 0.1 ppm at the catalytic device outlet	Regulation 310 CMR 7.03(21)

Table 3d

EU	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards[1]	Applicable Regulation and/or Approval No
9	Coatings/film/ cleanup solvents	VOC	See Section 5. Special Terms and Conditions, Table 8.	≤ 2.15 tons per calendar month and ≤ 8.57 tons in any 12 consecutive month period	PA #WE-14-002 (issued 6/6/14)
		Total HAP		≤137.0 pounds per calendar month and ≤ 548.0 pounds in any 12 consecutive month period	PA #WE-14-002 (issued 6/6/14)
19	Inks, OPP film and PVC film	VOC	See Section 5. Special Terms and Conditions, Table 8.	≤4.75 tons per calendar month and ≤14.26 tons in any 12 consecutive month period	PA #WE-18-020 (issued 8/15/19)
		Total HAP		≤1.4 tons per calendar month and ≤4.2 tons in any 12 consecutive month period	
20	Coatings, OPP film	VOC	See Section 5. Special Terms and Conditions, Table 8.	≤0.74 tons per calendar month and ≤2.22 tons in any 12 consecutive month period	PA #WE-18-020 (issued 8/15/19)
		Total HAP		≤70.3 pounds per calendar month and ≤ 211.0 pounds in any 12 consecutive month period	
22	Cleanup solvents	VOC	See Section 5. Special Terms and Conditions, Table 8.	≤0.53 tons in any 12 consecutive month period	PA #WE-18-020 (issued 8/15/19)
23	Cleanup solvents	VOC	See Section 5. Special Terms and Conditions, Table 8.	≤0.79 tons in any 12 consecutive month period	PA #WE-18-020 (issued 8/15/19)

Table 3e

EU	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards[1]	Applicable Regulation and/or Approval No
Facility-wide		Greenhouse gas	None	N/A	310 CMR 7.71 (state only)
		VOC	None	≤49.0 tpy in any 12 consecutive month period	PA #1-P-11-008 PA #1-P-11-014 PA #1-P-11-013 (issued 10/26/11)
		Total HAP	None	≤24.5 tpy in any 12 consecutive month period	
		Single HAP	None	≤9.8 tpy in any 12 consecutive month period	

Table 3a/ 3b/ 3c/ 3d /3e Key:
EU = Emission Unit Number
VOC = Volatile Organic Compounds
HAP = Hazardous Air Pollutant
lbs/hr = pounds per hour
lb/MMBtu = pounds per million British thermal units of heat input
gr/dscf = grains per dry standard cubic foot
tpy = tons per year
ppm = parts per million
≤ = less than or equal to
% = percent
opp = oriented polypropylene
pvc = polyvinyl chloride

Table 3a/ 3b/ 3c/ 3d/ 3e Foot Notes:

(1) To calculate the amount of any consecutive 12 month period, take the current calendar month amount and add it to the previous 11 calendar months total amount

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to the monitoring/testing, recordkeeping, and reporting requirements as contained in Tables 4a, 4b, 4c, 4d, 5a, 5b, 5c, 5d, 5e, 5f, 6a, 6b ,6c and 6d below and 310 CMR 7.00 Appendix C (9) and (10) and applicable requirements contained in Table 3a, 3b, 3c, 3d, 3e:

Table 4a

EU	Monitoring And Testing Requirements
1	1. In accordance with DEP Approval 1-P-11-008(9/29/11), the Permittee shall monitor on a calendar month basis for EU #1: a. The type of coatings used; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by EU 1.
	2. In accordance with 40 CFR 63.825(b)(4), the Permittee shall demonstrate compliance with the emission standard in condition #4, Table 3 herein, by demonstrating that the monthly average as-applied organic HAP content of all materials applied during the month is less than 0.04 kilograms HAP per kilograms of material applied as determined by Equation 6 contained in 40 CFR Part 63 Subpart KK.
	3. In accordance with 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material applied by following one of the procedures specified below: a. The owner or operator may test the material in accordance with Method 311 of Appendix A of 40 CFR Part 63. The Method 311 determination may be performed by the owner or operator of the affected source, the supplier of the material, or an independent third party. The organic HAP content determined by Method 311 must be calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(i)(A) through (C) of this section. b. The owner or operator may determine the weight fraction volatile matter of the material in accordance with 40 CFR 63.827(c)(2) and use this value for the weight fraction organic HAP for all compliance purposes. c. The owner or operator may use formulation data to determine the weight fraction organic HAP of a material. Formulation data may be provided to the owner or operator on a CPDS by the supplier of the material or an independent third party. Formulation data may be used provided that the weight fraction organic HAP is calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(iii)(A) through (D) of this section. In the event of an inconsistency between the formulation data and the result of Method 311 of appendix A of this part, where the test result is higher, the Method 311 data will take precedence unless, after consultation, the owner or operator can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
	4. In accordance with 310 CMR 7.04(4)(a), inspect and maintain each unit with an individual heat input capacity of greater than or equal to 3 MMBtu/hr in accordance with the manufacturer's recommendations and tested for efficient operation once each calendar year.

Table 4b	
EU	**Monitoring And Testing Requirements**
2	5. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013 (10/26/11), the Permittee shall monitor on a calendar month basis for EU 2: a. The type of coatings used in each machine; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by Lab Presses (L-1, L-3 and L-4 collectively)
3	6. In accordance with DEP Approval 1-P-11-008(9/29/11), the Permittee shall monitor on a daily basis the number of laminates produced from the Laminating Room.
4	7. In accordance with 40 CFR 63.342(g), the Permittee shall comply with the following operation and maintenance practices for the composite mesh pad system with a final stage HEPA filter. a. Once per quarter, visually inspect device to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device. b. Once per quarter, visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist. c. Once per quarter, visually inspect ductwork from tank to the control device to ensure there are no leaks. d. Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations.
	8. In accordance with 40 CFR 63.342(g), the Permittee shall comply with the following operation and maintenance practices for the mist eliminator. a. Once per quarter, visually inspect fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices. b. Once per quarter, visually inspect ductwork from tank or tanks to the control device to ensure there are no leaks. c. Perform washdown of fiber elements in accordance with manufacturers recommendations
	9. In accordance with 40 CFR 63.343(c)(1)(ii), the Permittee shall monitor the pressure drop across the composite mesh-pad system once each day that the affected source is operating.
	10. In accordance with 40 CFR 63.343(c)(1)(iii), the Permittee may repeat the performance test and establish as a new site-specific operating parameter the pressure drop across the composite mesh-pad system according to the requirements in 40 CFR 63.343(c)(1)(i) or (ii). To establish a new site-specific operating parameter for pressure drop, the Permittee shall satisfy the following requirements. a. Determine the outlet chromium concentration using the test methods and procedures in 40 CFR 63.344(c); b. Establish the site-specific operating parameter value using the procedures 40 CFR 63.344(d)(5); c. Satisfy the recordkeeping requirements in 40 CFR 63.346(b)(6) through (8); and d. Satisfy the reporting requirements in 40 CFR 63.347(d) and (f).

Table 4c

EU	Monitoring And Testing Requirements
4	11. In accordance with 40 CFR 63.343(c)(4)(ii), the Permittee shall monitor the pressure drops across the fiber-bed mist eliminator once each day that the affected source is operating.
	12. In accordance with 40 CFR 63.344, the Permittee shall comply with the applicable performance test requirements and test methods contained in this section.
5	13. In accordance with DEP Approval 1-P-11-014(10/21/11), the Permittee shall monitor on a calendar month basis for EU 5: a. The type of coatings used; b. Pounds of each coating applied; c. The VOC content of the coatings used; and d. The pounds of VOC emitted by EU 5.
6	14. In accordance with 40 CFR 63.6625(e), the Permittee must operate and maintain EU #6 and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
	15. In accordance with 40 CFR 63.6625(f), EU #6 shall be equipped with a non-resettable hour meter.
	16. In accordance with 40 CFR 63.6625(h), the Permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
	17. In accordance with 40 CFR 63.6625(j), the Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to 40 CFR Part 63 Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.
7	18. In accordance with 310 CMR 7.04(4)(a), inspect and maintain each unit with an individual heat input capacity of greater than or equal to 3 MMBtu/hr in accordance with the manufacturer’s recommendations and tested for efficient operation once each calendar year.
19	19. In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.825(b)(4), the Permittee shall demonstrate compliance with the emission standard in condition #27, Table 8f herein, by demonstrating that the monthly average as-applied organic HAP content of all materials applied during the month is less than 0.04 kilograms HAP per kilograms of material applied as determined by Equation 6 contained in 40 CFR Part 63 Subpart KK.

Table 4d

EU	Monitoring And Testing Requirements
19	20. In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material applied by following one of the procedures specified below: a. The owner or operator may test the material in accordance with Method 311 of Appendix A of 40 CFR Part 63. The Method 311 determination may be performed by the owner or operator of the affected source, the supplier of the material, or an independent third party. The organic HAP content determined by Method 311 must be calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(i)(A) through (C) of this section. b. The owner or operator may determine the weight fraction volatile matter of the material in accordance with 40 CFR 63.827(c)(2) and use this value for the weight fraction organic HAP for all compliance purposes. c. The owner or operator may use formulation data to determine the weight fraction organic HAP of a material. Formulation data may be provided to the owner or operator on a CPDS by the supplier of the material or an independent third party. Formulation data may be used provided that the weight fraction organic HAP is calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(iii)(A) through (D). In the event of an inconsistency between the formulation data and the result of Method 311 of appendix A of this part, where the test result is higher, the Method 311 data will take precedence unless, after consultation, the owner or operator can demonstrate to the satisfaction of MassDEP that the formulation data are correct.
19 20 22 23	21. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
Facility-wide	22. In accordance with DEP Approval 1-P-11-008(9/29/11), DEP Approval 1-P-11-013 (10/26/11) and DEP Approval 1-P-11-014 (10/21/11), the Permittee shall monitor on a calendar month basis, the total pounds of VOC and HAP emitted from the entire facility.
	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. In accordance with 310 CMR 7.00 Appendix C(9)(b), any compliance determination with the allowable smoke/opacity emission limit shall be in accordance with EPA Method 9, as specified in 40 CFR 60, Appendix A or shall be made using a continuous opacity monitor installed and operated in accordance with 40 CFR Appendix B.
	24. In accordance with 310 CMR 7.71(1) and Appendix C(9) establish and maintain data systems or record keeping practices (e.g. fuel use records, SF6 usage documentation, Continuous Emissions Monitoring System) for greenhouse gas emissions to ensure compliance with the reporting provisions of M.G.L. c. 21N, the Climate Protection and Green Economy Act, St. 2008, c. 298, § 6. (State only requirement)

Table 4a/4b/4c/4d Key:

EU = Emission Unit Number
VOC = Volatile Organic Compound
HAP = Hazardous Air Pollutant
CPDS = Certified Product Data Sheet
MMBtu/hr = million British thermal unit per hour
CFR = Code of Federal Regulations
USEPA = United States Environmental Protection Agency

Table 5a

EU	Recordkeeping Requirements
1	1. In accordance with DEP Approval 1-P-11-008(9/29/11), the Permittee shall document the coating development process as specified in Table 3a, condition #3 herein through trial reports and other relevant records, and keep such records on-site and available for inspection.
	2. In accordance with DEP Approval 1-P-11-008(9/29/11), the Permittee shall maintain comprehensive and accurate records on a calendar month basis for EU 1: a. The type of coatings used; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by EU 1.
	3. In accordance with 40 CFR 63.829(b), the Permittee shall maintain the following records on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1): a. Records specified in 40 CFR 63.10(b)(2), of all measurements needed to demonstrate compliance with this standard, such as, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.
	4. In accordance with 40 CFR 63.829(c), the Permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.825. The records shall be maintained in accordance with the requirements of 40 CFR 63.10(b).
	5. In accordance with 310 CMR 7.04(4)(a), maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These said records shall be posted conspicuously on or near each unit.
2	6. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013 (10/26/11), after conducting such a coating development process but before commencing production using a new coating, the Permittee shall document that it has developed a coating with the lowest VOC content possible. The Permittee shall document this process through its trial reports and other relevant records, and keep these records on-site and available for review.
	7. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013 (10/26/11), the Permittee shall maintain comprehensive and accurate records on a calendar month basis for EU #2: a. The type of coatings used in each machine; b. Pounds of each coating applied; c. The VOC and HAP content of the coatings used; and d. The pounds of VOC and HAP emitted by Lab Presses (L-1, L-3, and L-4 collectively).
	8. The Permittee shall maintain comprehensive and accurate records of the pounds of VOC per hour, based on an 8-hour averaging period, emitted from each of the lab printing presses when The Permittee is using a new type of coating that does not replace an existing coating listed in Section 5. Special Terms and Conditions, Table 8, and that has a higher VOC content than any of its existing coatings listed in Section 5. Special Terms and Conditions, Table 8.
	9. The Permittee shall maintain comprehensive and accurate records of the annual VOC emissions from any new product development.
3	10. In accordance with DEP Approval 1-P-11-008(9/29/11), the Permittee shall record on a daily basis the number of laminates produced from the Laminating Room. The total number of laminates produced each month shall be summed from the daily records, and recorded to track the 12-month rolling total of laminates produced.

Table 5b	
EU	**Recordkeeping Requirements**
4	11. In accordance with 40 CFR 63.343(c)(1)(ii), the Permittee shall record the pressure drop across the composite mesh-pad system once each day that the affected source is operating.
	12. In accordance with 40 CFR 63.343(c)(4)(ii), the Permittee shall record the pressure drop across the fiber-bed mist eliminator once each day that the affected source is operating.
	13. In accordance with 40 CFR 63.346(b)(1) through (12), (16) and 63.346 (c), the Permittee shall maintain the following records: a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR 63.342(f) and Table 1 of 40 CFR 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. b. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; c.Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3); f. Test reports documenting results of all performance tests; g. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of 40 CFR 63.344(e); h. Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; i The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; k. The total process operating time of the affected source during the reporting period; l. Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period, if the owner or operator is using the actual cumulative rectifier capacity to determine facility size in accordance with 40 CFR 63.342(c)(2); m. All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10, and 63.347. n. All records shall be maintained for a period of 5 years in accordance with 40 CFR 63.10(b)(1).

Table 5c	
EU	**Recordkeeping Requirements**
5	14. In accordance with DEP Approval 1-P-11-014(10/21/11), the Permittee shall record on a calendar month basis for EU 5: a. The type of coatings used; b. Pounds of each coating applied; c. The VOC content of the coatings used; and d. The pounds of VOC emitted by EU 5. All emissions from Press M-3 (EU #1), even while operating in conjunction with the Electron Beam Coating System, will be tracked in accordance with the provisions of MassDEP Final Approval #1-P-11-008 issued September 29, 2011.
6	15. In accordance with 40 CFR 63.6655(a), (d), (e) and (f), the Permittee shall maintain comprehensive and accurate records of: a. a copy of each notification and report that you submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). b. the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. c. performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(vii). d. all required maintenance performed on the air pollution control and monitoring equipment. e. actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b) including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. f. the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you. g. the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. h. the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for purposes specified in §63.6640(f)(4)(ii), the Permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.
7	16. In accordance with 310 CMR 7.04(4)(a), maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These said records shall be posted conspicuously on or near each unit.
8 10 11 21	17. In accordance with 310 CMR 7.03(6), a recordkeeping system shall be established and continued in sufficient detail to document the date of construction, substantial reconstruction or alteration and that the respective emission rates, operational limitations, equipment specifications and other requirements pursuant to 310 CM R 7.03 are met. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination.

Table 5d

EU	Recordkeeping Requirements
9	18. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain comprehensive and accurate records for EU 9 which shall include: a. The identity of each coating and cleanup solvent used in EU 9; b. The VOC and HAP content of each coating as-applied, used in EU 9; c. The VOC and HAP content of each cleanup solvent, used in EU 9; d. The amount (pounds) of each coating used in EU 9 during each month and in each 12 consecutive month period; e. The amount (gallons) of each cleanup solvent used in EU 9 during each month and in each 12 consecutive month period; f. The total pounds of VOCs emitted from EU 9; and g. The total pounds of HAPs emitted from EU 9. All emissions from Lab Press L- 3 (EU 2), even while operating in conjunction with the Electron Beam Coating System (EU 9), shall be tracked in accordance with the provisions of MassDEP Final Approval #1-P-11-008 issued September 29, 2011.
	19. In accordance with MassDEP Approval WE-14-002 (6/6/14), when using coatings which contain a VOC content greater than 3.07% by weight, the Permittee shall maintain comprehensive and accurate records of: a. the pounds of VOC per hour emitted from EU 9; and b. the total VOC emissions from the use of coatings containing a VOC content greater than 3.07% by weight during each month and in each 12 consecutive month period.
	20. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 3c, Table 8d and Table 8e herein. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report
	21. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain a copy of Plan Approval WE-14-002, underlying Application and the most up-to-date SOMP for EU 9 on-site.
	22. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain a record of routine maintenance activities, affecting air contaminant emission rates, performed on EU 9. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	23. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on EU 9. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.

Table 5e	
EU	**Recordkeeping Requirements**
19	24. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain comprehensive and accurate records which shall include, but are not limited to: a. The identity, quantity, formulation and density of each ink, additive, extender and any other VOC and/or HAP-containing material used on EU 19; b. The VOC content of each ink, additive, extender and any other VOC-containing material applied on EU 19; and c. The HAP content of each ink, additive, extender and any other HAP-containing material applied on EU 19.
	25. In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.829(b), the Permittee shall maintain the following records on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1): a. Records specified in 40 CFR 63.10(b)(2), of all measurements needed to demonstrate compliance with this standard, such as, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.
	26. In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.829(g), each owner or operator of an affected source subject to 40 CFR Part 63 Subpart KK shall maintain records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment), air pollution control equipment, or monitoring equipment.
	27. In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.829(h), each owner or operator of an affected source subject to 40 CFR Part 63 Subpart KK shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.823(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
20	28. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain comprehensive and accurate records which shall include, but are not limited to: a. The identity, quantity, formulation and density of each coating, additive, extender and any other VOC and/or HAP-containing material used on EU 20; b. The VOC content of each coating, additive, extender and any other VOC-containing material applied on EU 20; and c. The HAP content of each coating, additive, extender and any other HAP-containing material applied on EU 20.
22 23	29. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain comprehensive and accurate records which shall include, but are not limited to: a. The identity, quantity, formulation and density of each VOC and/or HAP-containing cleanup material applied on EU 22 and EU 23.

Table 5f

EU	Recordkeeping Requirements
19 20 22 23	30. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain adequate records on-site, with supporting calculations, to determine the compliance status with all operational, production, and emission limits contained in Table 2a/2b of Plan Approval WE-18-020 (8/15/19). Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report.
	31. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain a copy of Plan Approval WE-18-020 (8/15/19), underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.
	32. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s). The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	33. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s). At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates returned to compliant operation.
	34. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	35. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall maintain records required by Plan Approval WE-18-020 (8/15/19) on-site for a minimum of five (5) years.
	36. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall make records required by Plan Approval WE-18-020 (8/15/19) available to MassDEP and USEPA personnel upon request.
Facility -wide	37. In accordance with DEP Approval 1-P-11-008(9/29/11), DEP Approval 1-P-11-013 (10/26/11), and DEP Approval 1-P-11-014 (10/21/11), the Permittee shall maintain comprehensive and accurate records on a calendar month basis of the total pounds of VOC and HAP emitted from the entire facility.
	38. In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain records of all monitoring data and supporting information, including all stack test results and all ambient air quality modeling results, on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application
	39. In accordance with 310 CMR 7.12(3)(b), maintain copies of Source Registration and other information supplied to the Department to comply with 310 CMR 7.12, which shall be retained by the facility owner or operator for five years from the date of submittal.
	40. 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. (State Only Requirement).

Table 5a/5b/5c/5d/5e/5f Key:

EU = Emission Unit Number
VOC = Volatile Organic Compound
HAP = Hazardous Air Pollutant
RICE= Reciprocating Internal Combustion Engine
CFR = Code of Federal Regulations
SOMP = Standard Operating and Maintenance Procedure
USEPA = United States Environmental Protection Agency

Table 6a

EU	Reporting Requirements
1	1. In accordance with 40 CFR 63.830(b)(6), the Permittee shall submit a summary report specified in 40 CFR 63.10(e)(3) of this part on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 63.825. The summary report shall include, as applicable: a. Exceedances of the standards in 40 CFR 63.824–63.825. b. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.823(b), including actions taken to correct a malfunction. All summary reports shall be delivered or postmarked by the 30th day following the end of each calendar half.
	2. In accordance with 40 CFR 63.830(c)(2), all reports required by this subpart not subject to the requirements in paragraph (c)(1) of this section must be sent to MassDEP and the USEPA at the appropriate address listed in 40 CFR 63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The USEPA and MassDEP retain the right to require submittal of reports subject to paragraph (c)(1) of this section in paper format.
1 2 3	3. In accordance with DEP Approval 1-P-11-008(9/29/11),DEP Approval 1-P-11-013 (10/26/11),and DEP Approval 1-P-11-014 (10/21/11), the Permittee shall generate monthly reports in-house, by the 15th day of the following month, that document compliance with the rolling 12-month total emission limits for EU 1,2,3 and facility-wide as well as the associated production limits for EU 1, 2 and 3 specified in Table 3 herein.
4	4. In accordance with 40 CFR 63.347(d), the Permittee shall notify the USEPA and MassDEP of the intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin.
	5. In accordance with 40 CFR 63.347(f), reports of performance test results shall be submitted to the MassDEP no later than 90 days following the completion of the performance test.
	6. In accordance with 40 CFR 63.347(g)(1), the Permittee shall submit a summary report semiannually to the USEPA and MassDEP to document the ongoing compliance status of the source except when: a. The USEPA or MassDEP determines on a case-by-case that more frequent reporting is necessary to accurately assess the compliance status of the source; or b. The monitoring data collected by the owner or operator of the affected source in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

Table 6b	
EU	**Reporting Requirements**
4	7. In accordance with 40 CFR63.347(g)(3), the summary report shall contain the following information: a. The company name and address; b. An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c); c. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by 40 CFR 63.347(e); d. The beginning and ending dates of the reporting period; e. A description of the type of process performed in the affected source; f. The total operating time of the affected source during the reporting period; g. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes; h. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan for the source; i. If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed; j. A description of any changes in monitoring, processes, or controls since the last reporting period; k. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and l. The date of the report.
6	8. In accordance with 40 CFR 63.6603 and 63.6640, Footnote 2 of Table 2d, if an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice as soon as practicable and the Federal, State or local law under which the risk was deemed unacceptable.
	9. In accordance with 40 CFR 63.6640(e), the Permittee shall report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you.

Table 6c

EU	Reporting Requirements
9	10. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall notify MassDEP, in writing, the date on which EU #9 commences operation at the facility. This notice shall be provided to MassDEP within (5) days of commencing operation
	11. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall submit to MassDEP all information required by Plan Approval WE-14-002 over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	12. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall provide a copy to MassDEP of any record required to be maintained by Plan Approval WE-14-002 within 30-days from MassDEP's request.
	13. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 4d herein.
	14. In accordance with MassDEP Approval WE-14-002 (6/6/14), the Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 4d herein.
19	15. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall notify the Western Regional Office of MassDEP, in writing, the date on which EU 19 commences operation at the facility. This notice shall be provided to MassDEP within (5) days of commencing operation.
	16. In accordance with DEP Approval WE-18-020 (8/15/19), and 40 CFR 63.9(j), the Permittee shall submit any change in the information already provided under 40 CFR Part 63 to the Western Regional Office of MassDEP and the USEPA in writing within 15 calendar days after the change.
	17. In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.830(b)(6), the Permittee shall submit to the Western Regional Office of MassDEP and the USEPA a summary report specified in 40 CFR 63.10(e)(3) of this part on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 63.825. The summary report shall include, as applicable: a. Exceedances of the standards in 40 CFR 63.824–63.825. b. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.823(b), including actions taken to correct a malfunction. All summary reports shall be delivered or postmarked by the 30th day following the end of each calendar half.
	18. In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.830(c)(2), all reports required by this subpart not subject to the requirements in paragraph (c)(1) of 40 CFR 63.830 must be sent to the Western Regional Office of MassDEP and the USEPA at the appropriate address listed in 40 CFR 63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The USEPA and MassDEP retain the right to require submittal of reports subject to paragraph (c)(1) of 40 CFR 63.830 in paper format.
20	19. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall notify the Western Regional Office of MassDEP, in writing, the date on which EU 20 commences operation at the facility. This notice shall be provided to MassDEP within (5) days of commencing operation.

Table 6d

EU	Reporting Requirements
19 20 22 23	20. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall submit to MassDEP all information required by this Plan Approval WE-18-020 over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	21. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall provide a copy to MassDEP of any record required to be maintained by Plan Approval WE-19-025 within 30-days from MassDEP's request.
	22. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall submit to the Western Regional Office of MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3a Monitoring and Testing Requirements of Plan Approval WE-18-020 and Table 4d herein.
	23. In accordance with DEP Approval WE-18-020 (8/15/19), the Permittee shall submit to the Western Regional Office of MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3a Monitoring and Testing Requirements of Plan Approval WE-18-020 and Table 4d herein.
Facility -wide	24. The permittee shall submit a Source Registration/Emission Statement Form to MassDEP on an annual basis as required by 310 CMR 7.12.
	25. 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 shall cause such stack testing to be summarized and submitted to the MassDEP as prescribed in the agreed to pretest protocol.
	26. In accordance with 310 CMR 7.00: Appendix C(10)(c), the Permittee shall report a summary of all monitoring data and related supporting information to MassDEP at least every six months (January 30 and July 30 of each calendar year).
	27. Submit Annual Compliance report to MassDEP and USEPA by January 30 of each year and as required by General Condition 10 of this Permit.
	28. In accordance with 310 CMR 7.71(5), the Permittee shall electronically submit and certify by April 15th of each year a greenhouse gas emissions report to MassDEP. (State Only Requirement).

Table 6a/6b/6c/6d Key:
EU = Emission Unit Number
USEPA = The United States Environmental Protection Agency
MassDEP = Massachusetts Department of Environmental Protection
CFR = Code of Federal Regulations

C. GENERAL APPLICABLE REQUIREMENTS

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

D. REQUIREMENTS NOT CURRENTLY APPLICABLE

The Permittee is currently not subject to the following requirements:

Table 7

Regulation	Reason
310 CMR 7.16: Reduction of Single Occupant Commuter Vehicle Use	Facility employs fewer than 250 people.
40 CFR Part 64 -Compliance Assurance Monitoring	Facility is exempt since it does not meet the applicability criteria specified in 40 CFR 64.10(a)(1) through (3).

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 Tables 3a, 3b, 3c, 3d, 3e, 4a, 4b, 4c, 4d, 5a, 5b, 5c, 5d, 5e, 5f, 6a, 6b, 6c and 6d:

Table 8a

EU	Special Terms and Conditions
1	1. EU 1 is subject to the National Emission Standards for the Printing and Publishing Industry, 40 CFR Part 63.820 through 63.831 and shall comply with all applicable standards.
1 2	2. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013(10/26/11), the Permittee shall use inks with a VOC content no greater than specified in the following coating list.

Coating Identification	Coating Percent VOC
Ex -1	0.91%
Ex-2	0.18%
Ex-3	0.18%
Ex-4	1.56%
YI-1	0.79%
On -2	0.95%
Re -1	0.67%
Re-2	0.98%
Be -1	1.16%
BI-1	4.90%
BI-2	1.30%
BI-3	1.30%
BI-4	1.30%
Wt-1	1.80%
Wt-2	0.30%
Wt-3	0.47%
Wt-4	0.53%
YI-2	0.53%
Re-3	1.50%
Ex-5	1.81%
Ex-6	3.48%
Pe -1	1.80%
Pe-2	1.00%
Pe- 3	1.00%

Table 8b.

EU	Special Terms and Conditions
1 2	

Coating Identification	Coating Percent VOC
Pe-4	1.80%
Pe-5	1.70%
Pe-6	2.10%
Pe-7	1.80%
Pr -1	0.10%
Pr- 2	0.10%
Sb-1	43.80%
CI-1	50.00%
Df-1	0.00%
Gw-1	0.00%
PI-1	1.80%
PI-5	0.06%
PI-2	0.60%
PI-6	1.00%
Pl- 3	1.40%
Pl-7	0.06%
PI-4	3.50%
PI- 8	0.04%

2	3. In accordance with DEP Approval 1-P-11-008(9/29/11) and DEP Approval 1-P-11-013(10/26/11), in the event that the Permittee's actual annual emissions for any new product development will exceed one ton of VOCs per year, the Permittee shall submit a permit application to MassDEP in accordance with 310 CMR 7.02.
4	4. EU 4 is subject to the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR Part 63.340 through 63.348 and shall comply with all applicable requirements.
	5. In accordance with 40 CFR 63.342(f)(1)(i) through (iii), a. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices. b. Malfunctions shall be corrected as soon as practicable after their occurrence. c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
	6. In accordance with 40 CFR 63.342(f)(3)(i), the Permittee shall prepare, implement and maintain an up to date Operation and Maintenance Plan. The plan shall include the elements specified in 40 CFR 63.342(f)(3)(i)(A) through (E).
	7. In accordance with 40 CFR 63.343(c)(1)(iv), the requirement to operate a composite mesh-pad system within the range of pressure drop values established under 40 CFR 63.343(c)(1)(i) through (iii) does not apply during automatic washdown cycles of the composite mesh-pad system.

Table 8c.

EU	Special Terms and Conditions
6	8. EU 6 is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) 40 CFR Part 63.6580 through 63.6675 and shall comply with all applicable requirements.
	9. In accordance with 40 CFR 63.6603, Table 2d, the Permittee shall: a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(j) in order to extend the specified oil change requirement in Table 2d of 40 CFR Part 63 Subpart ZZZZ.
	10. In accordance with 40 CFR 63.6605(a) and (b), a. The Permittee shall be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times. b. At all times the Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
	11. In accordance with 40 CFR 63.6640(a), Table 6, the Permittee shall continuously comply with the work or management practices as required by the following: a. Operate and maintain EU 6 according to the manufacturer's emission-related operation and maintenance instructions; or b. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Table 8d.	
EU	**Special Terms and Conditions**
6	12. In accordance with 40 CFR 63.6640(f)(1), (2)(i) and (4), operate the engine according to the conditions described in 40 CFR 63.6640(f)(1), (2)(i) and (4). If you do not operate the engine according to the requirements in 40 CFR 63.6640(f)(1), (2)(i) and (4), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines. a. There is no time limit on the use of emergency stationary RICE in emergency situations. b. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the USEPA or MassDEP for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. c. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in 40 CFR 63.6640(f)(2) of this section. Except as provided in 40 CFR 63.6640 (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
1 4 6	13. EU 1 is subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table"1" to Subpart KK of 40 CFR 63]. EU 4 is subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table "1" to Subpart N of 40 CFR 63]. EU 6 is subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table"8" to Subpart ZZZZ of 40 CFR 63]. Compliance with all applicable provisions therein is required.
9	14. In accordance with DEP Approval WE-14-002 (6/6/14), EU 9 shall consist of the equipment specified in Table 1b herein
	15. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings used by EU 9 shall not exceed a VOC content of 3.07% by weight as-applied, except as allowed in accordance with Table 8d and 8e, condition #16 and#17 herein.
	16. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, VOC emissions shall not exceed 15.6 pounds per hour when applying a coating which has a VOC content greater than 3.07% by weight as-applied.

Table 8e.	
EU	**Special Terms and Conditions**
9	17. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the combined VOC emissions from the use of coatings containing a VOC content greater than 3.07% by weight as-applied shall be less than 1 ton in any 12 consecutive month period.
	18. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the cleanup solvents used by EU 9 shall not exceed a VOC content of 2.2% by weight and contain no HAPs.
	19. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 330 gallons of cleanup solvents shall be used in any 12 consecutive month period.
	20. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings used by EU 9 shall not exceed a HAP content of 0.0986% by weight as-applied.
	21. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 556,190 pounds of coating shall be used on EU 9 in any 12 consecutive month period.
	22. In accordance with DEP Approval WE-14-002 (6/6/14), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices: a. Store all VOC and/or HAP-containing coatings, process-related waste materials and VOC and/or HAP-containing materials in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials; d. convey VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: i. equipment cleaning is performed without atomizing the cleanup solvent; and, ii. all spent solvent is captured in closed containers; and f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.

Table 8f.

EU		Special Terms and Conditions
19	23.	In accordance with DEP Approval WE-18-020 (8/15/19), EU 19 shall consist of the equipment specified in Table 1b herein.
	24.	In accordance with DEP Approval WE-18-020 (8/15/19), EU 19 is subject to the National Emission Standards for the Printing and Publishing Industry, Subpart KK, 40 CFR Part 63.820 through 63.831 and shall comply with all applicable requirements.
	25.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, EU 19 shall only be used to apply inks to oriented polypropylene film and polyvinyl chloride film substrates.
	26.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the maximum capacity of any bucket, pitcher, or other type of container used for transferring ink during the color matching process shall not exceed 1 gallon of ink at any time.
	27.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the inks applied to oriented polypropylene (OPP) film substrates shall not exceed a calendar month weighted average VOC content of 0.829% by weight.
	28.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the inks applied to polyvinyl chloride (PVC) film substrates shall not exceed a calendar month weighted average VOC content of 1.426% by weight.
	29.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the inks applied to OPP film substrates shall not exceed a calendar month weighted average HAP content of 0.0990% by weight.
	30.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the inks applied to PVC film substrates shall not exceed a calendar month weighted average HAP content of 0.420% by weight.
	31.	In accordance with DEP Approval WE-18-020 (8/15/19) and 40 CFR 63.825(b), each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
	32.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., no more than 2,000,000 pounds of ink shall be used in any consecutive 12-month period.
20	33.	In accordance with DEP Approval WE-18-020 (8/15/19), EU 20 shall consist of the equipment specified in Table 1b herein.
	34.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, EU 20 shall only be used to apply coatings to oriented polypropylene film substrates.
	35.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the applied coatings shall not exceed a calendar month weighted average VOC content of 0.887% by weight.
	36.	In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the applied coatings shall not exceed a calendar month weighted average HAP content of 0.0422% by weight.

Table 8g.	
EU	**Special Terms and Conditions**
20	37. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., no more than 500,000 pounds of coatings shall be used in any consecutive 12-month period.
19 20	38. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the ink and coating mixing tanks associated with EU 19 and EU 20 shall be equipped with a lid, or other method approved by MassDEP.
	39. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the lid for each ink and coating mixing tank associated with EU 19 and EU 20 shall: a. extend at least 0.5 inch beyond the outer rim of the tank or be attached to the rim of the tank; and, b. be maintained so that when in place, the lid maintains contact with the rim of the mixing tank for at least 90% of the rim's circumference; and, c. if necessary, have an opening to allow for insertion of a mixer impeller and shaft, which opening shall be covered after insertion of the mixer, except to allow adequate clearance for the mixer shaft.
	40. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the Permittee shall comply with the following work practices: a. store all VOC and/or HAP-containing inks, coatings, process-related waste materials and VOC and/or HAP-containing materials in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials; d. convey VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; and e. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing inks, coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.
22	41. In accordance with DEP Approval WE-18-020 (8/15/19), EU 22 shall consist of the printing press floor cleaning operations in the vicinity of EU 1, EU 2 and EU 19.
	42. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the floor cleanup material shall not exceed a VOC content of 0.422 pounds per gallon of material as applied and contain no HAPs.
	43. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., no more than 2,500 gallons of floor cleanup materials shall be used in any consecutive 12-month period.
23	44. In accordance with DEP Approval WE-18-020 (8/15/19), EU 23 shall consist of the EB coating system cleaning operations for EU 5 and EU 20.

Table 8h.

EU	Special Terms and Conditions
23	45. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the electron beam coating system cleanup material shall not exceed a VOC content of 6.55 pounds per gallon of material as applied and contain no HAPs.
	46. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., no more than 240 gallons of electron beam coating system cleanup materials shall be used in any consecutive 12-month period.
22 23	47. In accordance with DEP Approval WE-18-020 (8/15/19), pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the Permittee shall comply with the following work practices: a. store all VOC and/or HAP-containing cleanup solvents, process-related waste materials and VOC and/or HAP-containing materials in closed containers; b. ensure that containers used for VOC and/or HAP-containing cleanup solvents, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials and except when actively using open mop buckets for floor cleaning operations; c. mop buckets shall be completely emptied of any VOC and/or HAP-containing materials or kept closed with a lid when not actively being used for floor cleaning operations; d. minimize spills of VOC and/or HAP-containing cleanup solvents, process-related waste materials, and VOC and/or HAP-containing materials; e. maintain cleaning equipment and solvent containers, including repairing solvent leaks; f. convey VOC and/or HAP-containing cleanup solvents, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes, except when using open mop buckets for floor cleaning operations; g. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment, etc. by ensuring that: i. equipment cleaning is performed without atomizing the cleanup solvent; and, ii. all spent solvent is captured in closed containers; and h. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing cleanup solvents, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.

Table 8a/8b/8c/8d/8e/8f/8g/8h Key:

EU = Emission Unit Number
HAP = hazardous air pollutant
VOC = volatile organic compound

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, 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

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[1] emission limitations specified in this Permit as a result of an emergency[2]. In order to use emergency as an

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

[2] An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the 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.

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 Waste Prevention the following deviations from permit requirements, by telephone, fax or electronic mail (e-mail) , within three (3) days of discovery of such deviation:

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

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

C. Exceedances of Permit operational limitations directly correlated to excess emissions.

D. Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.

E. Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the MassDEP Bureau of Waste Prevention Air Operating Permit Reporting

Kit, which is available to the Permittee via the MassDEP's web site, 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 Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

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

27. MODIFICATIONS

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

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

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 Part82, Subpart A, "Production and Consumption Controls".

D. If the Permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners". The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle

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

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

29. PREVENTION OF ACCIDENTAL RELEASES

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

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

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.