



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

January 31, 2020

Mr. Hubert McGovern
OMG, Inc.
153 Bowles Road
Agawam, MA 01001

Re: Application # 19-AQ09-000001-APP
Approval# WE-19-028
RESTRICTED EMISSION STATUS

Dear Mr. McGovern:

The Department of Environmental Protection, Bureau of Air & Waste, Western Regional Office ("MassDEP") has completed its review of your Restricted Emission Status ("RES") Application # 19-AQ09-00001-APP and proposes to issue a RES Final Approval for your facility. The issuance of the RES Final Approval is subject to the public review process.

Enclosed is a copy of the draft RES Final Approval and Public Notice regarding the proposed modifications. ***Please have the Public Notice published in the Springfield Republican. The Public Notice must be printed one time as a Legal Notice at your expense and a copy of the newspaper clip, with the date and the name of the Newspaper, must be sent by you to the attention of:***

***Marc Simpson, Permit Chief
Mass. Dept. of Environmental Protection
436 Dwight Street – 5th floor
Springfield, Massachusetts 01103***

The mandatory thirty (30) day public comment period will commence with the date of publication of the Public Notice. It is in the applicant's interest to publish this Public Notice upon receipt and forward proof of publication to the Department as soon as possible to avoid delays in processing your application.

Should you have any questions concerning this matter, please do not hesitate to contact Todd Wheeler in the Western Region office at (413) 755-2297.

Sincerely Yours,

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.

Marc Simpson
Permit Chief
Bureau of Air and Waste
Western Region

ecc: Undine Kipka, USEPA Region 1
Yi Tian, BAW, Boston

PUBLIC NOTICE

MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR AND WASTE
Western Regional Office
436 Dwight Street — 5th floor
Springfield, MA 01103
Phone 413-784-1100

Pursuant to Regulation 310 CMR 7.02(9), notice is given of the following application for Restricted Emission Status Final Approval and the action the Department proposes to take:

City/Town of: Agawam

Emission Source: Manufacture of Fasteners

Applicant: OMG, Incorporated

Location: 153 Bowles Road

Purpose: Restrict Volatile Organic Compounds ("VOC") emissions from the various cleaning, heat treating and drying processes of manufacturing fasteners to 49.0 tons per year and 12.0 tons per month.

Application #: 19-AQ09-000001-APP

Proposed Action: Final Approval of Restricted Emission Status application

The above application along with applicable regulations and procedures are available for inspection at the above address. Comments on the proposed action must be received at the above address within 30 days of this Public Notice.

Marc Simpson
Permit Chief
Bureau of Air and Waste
Western Regional Office



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Hubert McGovern
OMG, Inc.
153 Bowles Road
Agawam, MA 01001

Re: **AGAWAM**
Application # 19-AQ09-000001-APP
Approval # WE-19-028
Restricted Emission Status

RES Final Approval

Dear Mr. McGovern:

The Department of Environmental Protection, Bureau of Air and Waste, Western Regional Office ("MassDEP") received on November 5, 2019 an AQ09 Application for Restricted Emission Status ("RES") (19-AQ09-000001-APP) for OMG, Inc. to restrict emissions of volatile organic compounds (VOC) from various cleaning, coating, heat treating, and drying processes at the facility. The Department has determined that the RES Application is administratively and technically complete. MassDEP approves the RES legally limiting the amount of federal potential emissions from your facility through a restriction on emissions calculated from fuel use, process material usage and/or other restrictions.

This RES Final Approval is being issued in accordance with 310 CMR 7.02(10) of the Air Pollution Control Regulations ("Regulations"), 310 CMR 7.00 as adopted pursuant to M.G.L. c.111, Section 142B and 142D.

Included as part of this RES Final Approval are the following:

1. Special Conditions for RES;
2. General Conditions for RES; and
3. Appeal Rights

Please review the entire RES Final Approval carefully as it stipulates the particular conditions the facility owner/operator must comply with for the facility to be operated in compliance with the Regulations.

MassDEP has determined that the filing of an Environmental Notification Form (“ENF”) with the Secretary of Environmental Affairs, for air quality purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act and Regulation 310 CMR 11.00, Section 11.03, provide certain “Fail-Safe Provisions” which allow the Secretary to require the filing of an ENF and/or Environmental Impact Report at a later time.

Should you have any questions concerning this RES Final Approval, please contact Todd Wheeler at (413) 755-2297.

Sincerely,

Marc Simpson
Permit Chief
Bureau of Air & Waste
Western Region

cc: Undine Kipka, EPA Region 1 (electronic copy to Kipka.Undine@epa.gov)
Yi Tian, DEP, Boston (electronic copy)
Peter Czapienski, DEP, WERO (electronic copy)

SPECIAL CONDITIONS FOR RESTRICTED EMISSION STATUS APPROVAL

A. EQUIPMENT DESCRIPTION

OMG, Inc. (OMG) manufactures fasteners out of steel wire at its production facility located at 153 Bowles Road in Agawam, Massachusetts. The manufacture of fasteners is a multi-step process of drawing and shaping steel wire into fasteners, heat-treating to harden the wire, and then coating to finish the fasteners.

The processes at the OMG production facility are subject to several Plan Approvals issued by the Massachusetts Department of Environmental Protection (MassDEP). Limited Plan Approval No. #WE-15-009 (dated 9/9/15) authorized the installation and operation of the heat treatment equipment and includes limitations on emissions of volatile organic compounds (VOCs) from the heat treatment process and a facility-wide VOC emission limit of 30 tons per year.

OMG submitted an application for a Non-major Comprehensive Plan Approval (NmCPA) on July 22, 2019 to replace the existing LPA for the heat treatment process. The NmCPA application proposed increased VOC emission limits for the heat treatment process which would exceed the current 30 tons per year facility emission limit. The increase in emissions from the heat treatment process would also cause the potential emissions from all emissions units at the facility to exceed 50 tons per year. Consequently, the NmCPA application also proposed the removal of the 30 tons per year facility wide emissions limit. OMG has submitted this Restricted Emissions Status (RES) application to limit facility-wide VOC emissions to less than 50 tons per year, so that the facility will not exceed the VOC emissions threshold for a major stationary source as defined in 310 CMR 7.00, Appendices A & C.

OMG, Inc. has submitted information via a BAW AQ09 RES Application Form, which indicates that only the following process equipment at the 153 Bowles Road, Agawam, MA location emits air pollutants whose current individual and/or combined total federal potential emission rates were "major":

Table 1 – Potential Emissions in Tons per Year

Emission Unit	Emission Unit Description	Process Material Usage	VOC Potential to Emit	
			Tons/yr ⁽²⁾	Basis for Emission Potential
EU 1	Space Heaters	Natural Gas	0.42	Max. Fire Rate & 5.5 lb/MMCF ⁽¹⁾
EU 2	Dip/Spin Application Line	Coating	8.35	Plan Approval #1-P-94-045 Limit
EU 2	Dip/Spin Drying Oven	Natural Gas	0.07	Max. fire Rate & 5.5 lb/MMCF ⁽¹⁾
EU 3	Stamping Line	Lubricant & Wash	0.24	Actual Average Emission Rate (0.0555 lb/hr) x 8760 hrs/yr
EU 4	Screw Heading, Pointing & Threading Line	Lubricant & Wash	0.68	Actual Average Emission Rate (0.154 lb/hr) x 8760 hrs/yr)
EU 6	E-coat Process including Drying Oven and Cleaning	Low VOC Coatings, Natural Gas fuel and clean-up solvent	9.0	Plan Approval #WE-14-006 Limit
EU 7	Parts Cleaner	Solvent	0.54	Actual Average Emission Rate (0.123 lb/hr) x 8760 hrs/yr
EU 12/13/14	Mesh Belt Heat Treatment Lines	Parts Treated	29.5	Projected Emissions from Appl. #19-AQ02/03P-000006 ⁽³⁾
EU 15/16	Integral Quench Heat Treatment	Parts Treated	4.3	
Facility-wide Potential Emissions			53.1	
(1) From AP-42 EPA Emission Factor. (2) Based on a 12-month rolling total. (3) Potential VOC emissions from NmCPA Appl. #19-AQ02/03-000006-APP based on maximum expected annual production rates.				

B. EMISSION LIMITS

- The emissions of **VOC** from the subject OMG, Inc., located in Agawam, Massachusetts shall be restricted to no more than:
 - 12 tons of VOC per month,**
 - 49 tons of VOC per twelve month rolling calendar period.**
- OMG shall continue to comply with the following existing emission restrictions and limits summarized in Table 2 Below:

Table 2 – Existing Equipment and Emissions Restrictions/Limitations

Emission Unit	Emission Unit Description	Process Material Usage	Restriction/Limitation	
			Limit	Existing Approval #
EU 2	Dip/Spin Application Line	Coating	1373 pounds per rolling 30-day total (8.35 tons per year)	Plan Approval #1-P-94-045
EU 6	E-coat Process including Drying Oven and Cleaning	Low VOC Coatings, Natural Gas fuel and clean-up solvent	9.0 tons per year	Plan Approval #WE-14-006

C. PRODUCTION LIMITS

Not applicable.

D. OPERATING LIMITS

OMG, Inc. shall restrict its maximum facility-wide VOC usage at the 153 Bowles Road, Agawam, MA location such that none of the facility-wide federally enforceable caps in Special Condition B above shall be exceeded.

E. MONITORING REQUIREMENTS

See Special Condition F. below.

F. RECORDKEEPING REQUIREMENTS

See also GENERAL CONDITION K. below.

To ensure that facility-wide VOC emissions do not exceed the proposed limit in this RES application, OMG, Inc. shall comply with the monitoring and recordkeeping requirements in the existing Plan Approvals for facility equipment. Specifically:

1. Per Plan Approval #1-P-94-045 for the dip spin coating process, OMG will:
 - a. Maintain daily records of the quantity, density and VOC, solids, and water content of coatings used, and pounds VOC emitted.
 - b. Conduct an annual inventory of coatings, cleaning solvents and other VOCs consumed and submit an annual report comparing the results of the inventory to the VOC emissions determined by the daily tracking.
2. Per Plan Approval #WE-14-006 for the E-Coat process, OMG will:
 - a. Monitor and maintain monthly records of the name, quantity added and VOC content of each paste, resin and solvent added to the E-Coat tank.
 - b. Monitor and record operational parameters for the wet electrostatic precipitator (WESP) daily or twice per 8-hour shift, as specified in the Plan Approval, and inspect the WESP fog nozzles every six months and record the results of the inspection.
 - c. Maintain records of the name, quantity used and VOC content of the solvents used for hand cleaning of process equipment.
 - d. By the 15th of each month, compile and maintain the records of the actual VOC emissions from the E-Coat process for the previous calendar month and the prior 12-month period.

3. Per Plan Approval #WE-15-009 and the NmCPA application for the Heat Treatment Process, OMG, Inc. will:
 - a. Monitor and maintain monthly records of the quantity of quench oil added to each heat treatment line and the quantity of waste oil recovered from the oil-water separators for each of the wash tanks associated with the heat treatment process.
 - b. By the 15th of each month, compile and maintain records of the actual VOC emissions from the heat treatment process for the previous calendar month and the prior 12-month period.
4. Per 310 CMR 7.02(9)(e)2, OMG will monitor all operations and compile sufficient information to determine and record the facility-wide actual VOC emissions and verify compliance with the proposed monthly and 12-month rolling emission limits in this application. Actual VOC emissions from the facility will be reported in accordance with 310 CMR 7.12, Source Registration.

G. REPORTING REQUIREMENTS

See also GENERAL CONDITION L. below.

1. If any Short-term or Long-term emission limit established with this Approval is exceeded, OMG, Inc. shall:
 - a. notify the Western Regional Office of the MassDEP via fax as soon as possible thereafter of the exceedance and its duration; and
 - b. notify the MassDEP in writing no later than the 15th day of the following month, and
 - c. within seven (7) days of the initial notification, mail to the MassDEP a copy of the subject monthly report, along with a description of the exceedance and a list of specific steps the facility is taking to prevent exceedances from happening again.
2. OMG, Inc. shall submit to the MassDEP an annual compliance report of VOC emissions by March 15th for the previous calendar year to demonstrate compliance with the limits in this Approval.

II. GENERAL CONDITIONS FOR RESTRICTED EMISSION STATUS APPROVAL

- A. OPERATION** – No person shall operate this facility except in conformance with the requirements established in this Restricted Emission Status Approval.
- B. SUSPENSION** – This approval may be suspended, modified, or revoked by the MassDEP if, at any time, the MassDEP determines that the facility is violating any condition or part of the approval.
- C. OTHER REGULATIONS** – This approval does not negate the responsibility of the owner/operator to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this approval imply compliance with any other applicable federal, state or local regulation now or in the future.
- D. EXISTING APPROVALS** – All plan approvals issued under 310 CMR 7.02 prior to the effective date of this RES Approval shall continue to meet the emission rates and approved conditions specified in the applicable plan approval(s) unless specifically altered by this RES Approval.
- E. VISIBLE EMISSIONS** – The facility shall be operated in a manner to prevent the occurrence of visible emissions which cause or contribute to a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.06.
- F. DUST AND ODOR** – The facility shall be operated in a manner to prevent the occurrence of dust or odor conditions which cause or contribute to a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.09.
- G. NOISE** – Noise from the facility during routine operation, including startups and shutdowns, shall not exceed the MassDEP noise guidelines and shall not cause a condition of air pollution as defined in Regulation 310 CMR 7.01 and 7.10.
- H. ASBESTOS** – Should asbestos remediation/removal be required as a result of this RES Approval, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15.
- I. MONITORING** – Equipment or emission monitoring systems installed for the purpose of documenting compliance with this approval shall be installed, calibrated, maintained and operated in sufficient manner to ensure continuous and accurate operations at all times.
- J. TESTING** – Any emission testing to be compared to limitations in this approval must be conducted in accordance with the Environmental Protection Agency test methods as specified in the Code of Federal Regulations, Title 40, Part 60, Appendix A - Standards of Performance for New Stationary Sources or by another method correlated to the above method to the satisfaction of MassDEP and in accordance with the requirements noted in 310 CMR 7.13.

In accordance with 310 CMR 7.04(4)(a), each fuel utilization facility shall be inspected and maintained in accordance with the manufacturer's recommendations and tested for efficient operation at least once in each calendar year. The results of said inspection, maintenance and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near the permitted equipment.

K. RECORDKEEPING – A recordkeeping system shall be established and continued on site by the permittee. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination. Record keeping shall, at a minimum, include:

1. Compliance records sufficient to demonstrate that emissions have not exceeded what is allowed by this RES Approval. Such records may include daily production records, raw material usage rates, fuel purchase receipts, emissions test results, monitoring equipment data and reports.
2. Maintenance: A record of routine maintenance activities performed on emission unit control equipment and monitoring equipment including, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
3. Malfunctions: A record of all malfunctions on emission unit control and monitoring equipment including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed and the emission unit returned to compliance.
4. All records shall be kept on site for five (5) years and shall be made available to MassDEP upon request.

L. REPORTING – In accordance with 310 CMR 7.12(7), the facility shall register on a form obtained from MassDEP such information as the MassDEP may specify including:

1. The nature and amounts of emissions from the facility.
2. Information which may be needed to determine the nature and amounts of emissions from the facility.
3. Any other information pertaining to the facility which MassDEP requires.
4. Information required by 310 CMR 7.12(1)(a) shall be submitted annually.
5. The Regional Bureau of Waste Prevention, Compliance and Enforcement office must be notified by telephone or fax as soon as possible after the occurrence of any upsets or malfunctions to the facility equipment, air pollution control equipment, or monitoring equipment which result in an excess emission to the air and/or a condition of air pollution.

M. MODIFICATIONS – Any proposed increase in emissions above the limits contained in this RES Approval must first be approved in writing by MassDEP pursuant to 310 CMR 7.02. In addition, any increase may subject the facility to additional regulatory requirements.

N. REMOVAL OF AIR POLLUTION CONTROL EQUIPMENT – No person shall cause, suffer, allow, or permit the removal, alteration or shall otherwise render inoperative any air

pollution control equipment or equipment used to monitor emissions which has been installed as a requirement of 310 CMR 7.00, other than for reasonable maintenance periods or unexpected and unavoidable failure of the equipment, provided that MassDEP has been notified of such failure, or in accordance with specific written approval of MassDEP.

Appeal Rights

This Final Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date you received this document.

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 Final Approval 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) must be mailed to:

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.