

**MassDEP FACT SHEET on Proposed Air Quality Permit for
FLEXcon Company, Inc.
1 FLEXcon Industrial Park, Spencer, Massachusetts
(July 13, 2023)**

Introduction

The Massachusetts Department of Environmental Protection (MassDEP) conducts enhanced community engagement activities when a proposed air permit decision will be made for project that is in or near a population that has been designated by the state as an “Environmental Justice” Population. MassDEP is conducting enhanced community engagement activities because the FLEXcon Company, Inc. (FLEXcon) facility at One FLEXcon Industrial Park in Spencer has submitted an air permit application to MassDEP and the facility is located less than one mile from an area designated as an Environmental Justice Population. As part of MassDEP’s enhanced community engagement, MassDEP prepared this Fact Sheet for distribution to interested parties in the area around the facility.

Overview of the Air Quality Permit Application

FLEXcon filed an air quality permit application with MassDEP for proposed activity at its existing manufacturing facility at 1 FLEXcon Industrial Park, Spencer, Massachusetts. FLEXcon is located less than one mile from a designated Environmental Justice Population for income. See the attached map showing the FLEXcon location and the designated Environmental Justice Population area.

FLEXcon makes pressure-sensitive films and adhesives through manufacturing processes include coating, laminating, and finishing pressure-sensitive materials used in a variety of applications ranging from product identification labels, picture-on-picture and promotional graphics, stickers, and decals.

FLEXcon’s proposed equipment modification is subject to the Massachusetts Air Pollution Control Regulations, which can be found in the Code of Massachusetts Regulations at 310 CMR 7.00. FLEXcon must apply for and receive an air permit (known as a “Plan Approval” or “Approval”) before it can install specific air pollution control equipment. Specifically, FLEXcon must apply for and obtain a Non-Major Comprehensive Plan Approval air permit. FLEXcon is designated under MassDEP’s Air Pollution Regulations as a major source of volatile organic compound emissions and hazardous air pollutant emissions. Volatile organic compounds contribute to ground level ozone (otherwise known as smog), and hazardous air pollutants can cause adverse health effects over a lifetime of continuous exposure. MassDEP is currently reviewing the permit application, which was filed on February 9, 2023. After completing its review, MassDEP will issue a proposed decision to approve or deny the permit application, and at that time MassDEP will provide a 30-day public comment period on its proposed permit decision. Information on how to review the permit application, how to be notified of MassDEP’s proposed decision, and how to submit comments can be found at the end of this Fact Sheet. MassDEP will distribute the notification of public comment (“Public Notice”) to Environmental Justice local community interested parties

when the public comment period begins. For convenience, MassDEP will also attach this Fact Sheet to the Public Notice.

Summary of MassDEP's Draft Air Permit:

FLEXcon's air permit application proposes to move the exhaust from one of its coating lines to a new and more efficient pollution control device. The new air pollution control equipment is called a Regenerative Thermal Oxidizer (RTO). This equipment will destroy volatile organic compounds and hydrocarbons emissions created during the manufacturing process. FLEXcon proposes to replace the existing air pollution control equipment because the more efficient RTO will allow FLEXcon to operate that process line at full capacity and still meet the emission limits in its permits and MassDEP's air pollution control regulations. If FLEXcon's permit application is approved, the allowable air pollutants from the facility will not be increased from the emission limits contained in FLEXcon's current air permits. The current emission limits established in a 2018 air permit for this process line are 1.35 tons per year of volatile organic compounds and 0.33 tons per year of hydrocarbons.

If MassDEP issues an air permit, the agency will include in the permit all required monitoring, testing, record-keeping, and reporting requirements to ensure that the Facility will operate in compliance with applicable regulations and permit requirements. Specifically, the Facility will continuously monitor RTO temperatures; monitor enclosure head pressures to ensure that 100% of the vapors are captured; and track volatile organic compounds and hydrocarbons usage. The new equipment will be subject to an initial compliance stack test conducted by an independent third-party testing firm in accordance with United States Environmental Protection Agency approved methods. The RTO will also be subject to compliance testing on a regular basis. Any deviations from the requirements in the air permit must be reported to the MassDEP, and the Facility must submit semi-annual and annual compliance monitoring and certification reports to MassDEP. All records related to these requirements that are submitted to MassDEP are publicly available for interested parties.

MassDEP Air Quality Permitting Process and Public Comment Opportunity:

MassDEP is in the process of reviewing FLEXcon's application for the air permit and MassDEP will soon issue a *proposed* decision to approve or deny the permit application. At that time, MassDEP will start the 30-day public comment period. After the 30-day public comment period, MassDEP will consider and address any comments received about MassDEP's proposed permit decision. When MassDEP issues the final permit or denial of FLEXcon's application, a 21-day appeal period will begin. During the appeal period, an adjudicatory hearing may be requested by FLEXcon and/or those individuals or groups that have standing. MassDEP will notify interested parties of the start of the public comment period on MassDEP's proposed permit decision.

If you need assistance translating any permit-related materials into another language, please contact the MassDEP Central Regional Air Quality Permit Unit at Thomas.Hannah@mass.gov or CERO.Air@mass.gov.

Location of Draft Permit and Application Materials:

Application materials and MassDEP's proposed decision can be found online at MassDEP website: (<https://eeaonline.eea.state.ma.us/EEA/PublicApp/>), click on the orange "Search and/or Comment" button, then search the Site Name/Location Name "FLEXcon".

The Massachusetts Air Pollution Control Regulations can be found at 310 CMR 7.00. These regulations are available at local libraries or on MassDEP's website at [310 CMR 7 \(mass.gov\)](#)

FLEXcon Contact Information

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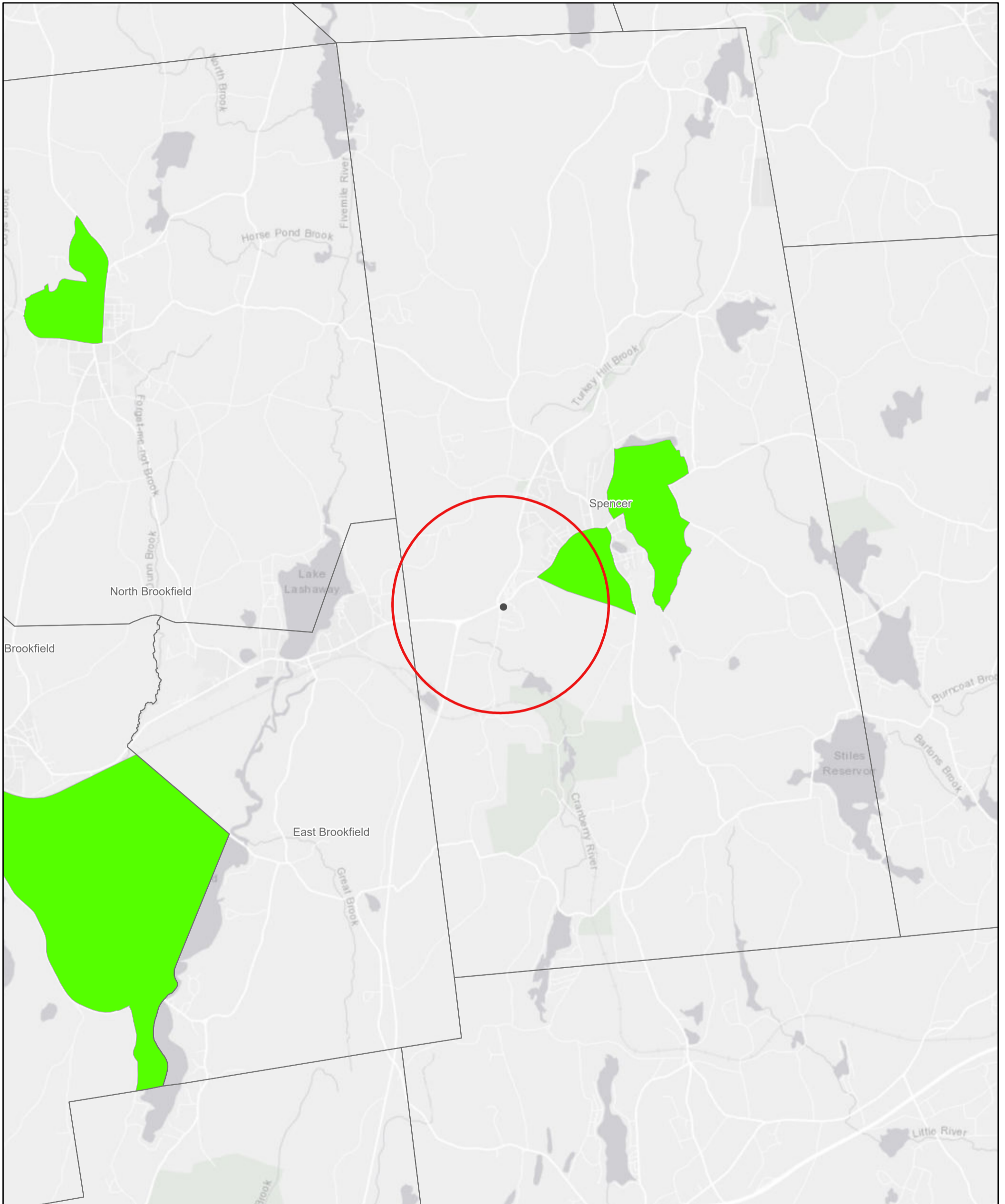
MassDEP Contact Information

Air Quality Permit Chief: Thomas Hannah
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508-767-2845

FLEXcon Facility Location and Designated Environmental Justice Population Area

The Massachusetts Executive Office of Energy and Environmental Affairs has designated populations within a one-mile radius of the FLEXcon facility as Environmental Justice ("EJ") populations. The populations are designated as EJ for Income. See the attached map showing the facility location and the designated EJ population area.

2020 Environmental Justice Neighborhoods



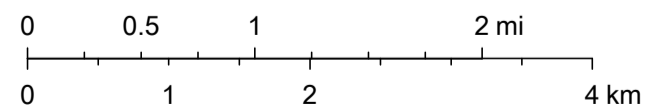
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 Override 1

MA 2020 Environmental Justice Block Groups

 Income: at least 25% of households have a median household income 65% or less than the state median household income

1:72,224



MassGIS, Esri, HERE, Garmin, GeoTechnologies, Inc.,
USGS, EPA