

# MassDEP Fact Sheet Proposed Decision on Air Quality Permit (November 2022)

## FLEXcon Spencer Facility

1 Flexcon Industrial Park, Spencer, Massachusetts

### Introduction

FLEXcon Company, Inc. (FLEXcon) has filed an Air Quality Plan Application with the Massachusetts Department of Environmental Protection (MassDEP) for its existing facility at 1 Flexcon Industrial Park, Spencer, Massachusetts. FLEXcon's proposed facility modification is subject to the Massachusetts Air Pollution Control Regulations (310 CMR 7.00) and FLEXcon must apply for and receive a permit (known as a "Plan Approval" or "Approval") before it can begin construction of the project. MassDEP is currently reviewing the permit application according to the applicable regulations. After completing its review, MassDEP will issue a proposed decision to approve or deny the permit application, and at that time will provide a 30-day public comment period on its proposed decision. Information on how to review the permit application and be notified of MassDEP's proposed decision, and how to submit comments, can be found at the bottom of this Fact Sheet.

### Facility Information

FLEXcon is a manufacturer of pressure-sensitive films and adhesives headquartered in Spencer, Massachusetts. Its 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.

The project is subject to MassDEP's Air Pollution Regulations 310 CMR 7.02 which require FLEXcon to apply for and obtain a Non-Major Comprehensive Plan Approval (NMCPA) air permit. In addition, FLEXcon is designated under MassDEP's Air Pollution Regulations 310 CMR 7.00 as a major source of volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions, and as such operates under class of air permits called an Operating Permit issued pursuant to 310 CMR 7.00, Appendix C. VOCs can contribute to ground level ozone, otherwise known as smog, and HAPs can impact human health when there is exposure in high concentrations and for longer periods of time.

### Summary of MassDEP's Proposed Air Permit

FLEXcon proposes to replace a currently-permitted air pollution control device called a Regenerative Thermal Oxidizer (RTO) with a new RTO. An RTO is a type of air pollution control equipment that destroys HAP, VOC, and odorous emissions created during the industrial processes. FLEXcon is replacing its existing RTO because it is approaching the end of its useful life and FLEXcon seeks to proactively replace it rather than waiting until it can no longer operate effectively. The new RTO will have the same or better pollutant destruction efficiency as the currently-permitted RTO. The current RTO controls VOC and HAP emissions associated with three existing process lines, and the proposed new RTO will control emissions from two existing process lines (referred to as PS7 and PS10) while the third process line (PS11) will be decommissioned.

In the Facility's application, FLEXcon has proposed, and MassDEP will include in any resulting Approval, all monitoring, testing, record-keeping, and reporting requirements necessary to ensure that the Facility will operate in compliance with applicable regulations and Approval requirements. Specifically, the Facility will continuously monitor RTO temperatures, enclosure head pressures to ensure that 100% of the vapors are captured, and coating application rates. The new RTO will be subject to an initial compliance stack test conducted by a 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 Approval 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 stakeholders.

### **MassDEP Air Quality Permitting Process and Public Comment Opportunity**

MassDEP is in the process of reviewing FLEXcon's application for the Approval and will issue a *proposed* decision to approve or deny the Approval application. After the 30-day public comment period, MassDEP will consider and address any comments received about MassDEP's proposed Approval decision. When MassDEP issues the final Approval or denial of FLEXcon's application, a 21-day appeal period will begin. During the appeal period, an adjudicatory hearing may be requested by those individuals or groups that have standing. MassDEP will notify interested stakeholders of the start of the public comment period on MassDEP's proposed approval decision. If you need assistance translating any permit-related materials into another language, please contact the MassDEP Regional Air Quality Permit Unit at [Thomas.Hannah@mass.gov](mailto:Thomas.Hannah@mass.gov) and [Maria.Lannunziata@mass.gov](mailto:Maria.Lannunziata@mass.gov).

### **Location of Proposed Permit/Approval Decision 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 on FLEXcon Company, Inc. on the resulting page.

### **FLEXcon Facility Location and Designated Environmental Justice Populations**

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 Minority. See the attached map showing the facility location and the designated EJ population area.

### **FLEXcon Contact Information**

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# FLEXcon Location and Designated Environmental Justice Population Area

