MassDEP Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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FINAL 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"]:
FLEXcon Company, Inc.
1 FLEXcon Industrial Park
Spencer, MA 01562

INFORMATION RELIED UPON:
Transmittal No. X223989

FACILITY LOCATION:
FLEXcon Company, Inc.
1 FLEXcon Industrial Park
Spencer, MA 01562

FACILITY IDENTIFYING NUMBERS:
AQ ID: 118/0998
FMF FAC NO.: 130929
FMF RO NO.: 51617

NATURE OF BUSINESS:
Manufacturer of Pressure Sensitive Materials

Standard Industrial Classification (SIC): 3081
North American Industrial Classification System (NAICS): 326113

RESPONSIBLE OFFICIAL:
Name: Darwin M. Irish
Title: Director, Risk Management

FACILITY CONTACT PERSON:
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Title: Director, Risk Management
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This Operating Permit shall expire on <u>January 29, 2024.</u>

For the Department of Environmental Protection

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.

Roseanna E. Stanley
Permit Chief, Bureau of Air and Waste

January 29, 2019
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

FLEXcon Company, Inc. ("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. A majority of pressure sensitive coating production occurs in Plants 2, 4 and 5.

FLEXcon is classified as a major source of volatile organic compounds ("VOC") and hazardous air pollutant ("HAP") emissions and as such the Facility operates under an Operating Permit ("OP") issued pursuant to 310 CMR 7.00, Appendix C. The majority of the VOCs utilized in the manufacture of films and adhesives are HAPs. The VOCs/ HAPs are components of the coatings and adhesives applied to a web of paper or plastic. Examples of HAPs used in the formulations include: toluene, vinyl acetate, and xylene.

Since the last Operating Permit there have been several Plan Approvals issued to FLEXcon to consolidate all previous Plan Approvals into one single Plan Approval. In April 2016, a new Durr regenerative thermal oxidizer was installed to control VOC and HAP emission from coating lines PS 12 and 13 located in Plant 5. In June 2016, a 3 zone natural gas oven serving PS8 replaced a 2 zone oven. EU PS15, previously identified as PS8, was re-routed from the Alstom regenerative thermal oxidizer (RTO) to an existing TANN RTO located in Plant 4. In January 2017, PS8 was re-designated to EU PS15 and PS 4 was decommissioned. The Enercon LM346 Corona treater was moved from PS4 to PS15. A Pillar VersaTreat dual dielectric station corona treater was added to PS 15 and a Sherman LM4175-39 treater was removed from service.

All of FLEXcon's process emission units ("EUs") are subject to two Federal regulations:

- 40 CFR 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations -New Source Performance Standards ("NSPS") and
- 40 CFR 63, Subpart JJJJ - Paper and other Web Surface Coating, National Emission Standards for Hazardous Air Pollutants ("NESHAPS"). 40 CFR 63 Subpart JJJJ defines water based coatings as coatings consisting of aqueous solutions of polymer resins with less than 4% of VOC and HAP by weight.

40 CFR 60 Subpart RR and 40 CFR 63 Subpart JJJJ apply to the following emission units: PS7,

PS9, PS10, PS11, PS12, PS13, PS14, PS15, DYE, TC2-3, TC2-4, TC2-5, 2LB1, 2LB2, 2LB3, 2LB4, 2LB5 and 5X01

FLEXcon is subject to the 40 CFR Part 64, Compliance Assurance Monitoring (CAM) Plan.

There are five (5) emergency generators, EU1-EU5, that are regulated by this Operating Permit.: The four (4) of the emergency generators are subject to 40 CFR 63 Subpart ZZZZ:

- EU 1 is a DMT emergency generator (model 125GC) with a maximum input rating of 1.85 MM Btu/hr (125kW) installed in 1987.
- EU 2 is a Kohler emergency generator (model 80RZ72) with a maximum input rating of 1.38 MM Btu/hr (80 kW) installed in 1991.
- EU 3 is a Kohler emergency generator (model 80RZ72) with a maximum input rating of 1.38 MM Btu/hr (80 kW) installed in 1991.
- EU 4 is a Kohler emergency generator (model 70RZ2726372) with a maximum input rating of 0.97 MM Btu/hr (60kW) installed in 1991.

The fifth emergency generator, EU 5, is a Kohler emergency generator (model 180REZXB) rated at 1.38 MMBtu/hr (180 kW or 241 Hp) installed in the Technology Center in 2012. EU 5 is subject to the Environmental Results Program ("ERP") Certification, 310 CMR 7.26(42). This emergency generator is subject also to 40 CFR 60 Subpart JJJJ.

The two boilers are subject to 40 CFR 63, Subpart DDDDD - NESHAPS for Industrial, Commercial and Institutional Boiler and Process Heaters at a major HAP facility.

- A Fulton Steam Boiler, EU B 1 in Plant 5, and.
- Aerco Boilerm EU B 2 in Plant 2, Model Number BMK2.0LN.

Massachusetts Greenhouse Gas Reporting Program

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: carbon dioxide ($CO_{2)}$, methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

2. EMISSION UNIT IDENTIFICATION

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

Table 1

EU	Description of EU	EU Design Capacity	Pollution Control Device
PS7	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	6.00 MMBtu/hr Corona treater = 3kW	Plant 4 Alstom Regenerative Thermal Oxidizer
PS9	Custom Built Water Based Pressure Sensitive Adhesive Label Coating Line and Corona Treater with NG oven	7.50 MMBtu/hr Corona treater = 15kW	N/A
PS10	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven rated	6.80 MMBtu/hr Corona treater = 3kW	Plant 4 Alstom Regenerative Thermal Oxidizer
PS11	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	5.19MMBtu/hr Corona treater = 3kW	Plant 4 Alstom Regenerative Thermal Oxidizer
PS12	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	5.61 MMBtu/hr Corona treater = 3kW	Plant 5 DURR Regenerative Thermal Oxidizer
PS13[1]	Pressure sensitive Adhesive Label Coating line and Corona treaters with NG oven	Primary corona treater = 5kW Secondary corona treater= 15kW	Plant 5 DURR Regenerative Thermal Oxidizer
PS14	Pressure sensitive Adhesive Label Coating line and Corona treater with NG oven	8.25MMBtu/hr Corona treater= 15kW Max rate of 230 gph of solvent based coatings and adhesives.	Plant 5 ABB Regenerative Thermal Oxidizer
PS15[1]	Pressure sensitive Adhesive Label Coating line and Corona treaters with NG oven	7 MMBtu/hr Primary corona treater = 7kW Secondary corona treater= 3kW	Plant 4 TANN Regenerative Thermal Oxidizer
DYE	Custom Built Dye Coating Machine		Plant 2ABB Thermal Oxidizer
TC2-3	Top Coating Line and Corona Treater with NG oven	3.2 MMBtu/hr Corona treater= 5kW	Plant 2 ABB Thermal Oxidizer
TC2-4	Top Coating Line and Corona Treater with NG oven	3 MMBtu/hr Corona treater= 4kW	Plant 2 ABB Thermal Oxidizer
TC2-5[1]	Custom Built Top Coating Line and Corona Treaters with NG oven	4 MMBtu/hr 50 gph coating /adhesive Primary corona treater = 4kW Bottom corona treater = 5kW Top corona treater = 5kW	Plant 2 ABB Thermal Oxidizer
2LB5[1]	Modular Coater and Corona Treaters	58 gph coating /adhesive	Plant 2 ABB Thermal Oxidizer

Table 1			
EU	**Description of EU**	**EU Design Capacity**	**Pollution Control Device**
2LB1	ITW Dynatec Hot Melt Adhesive Pilot Coater 20 inch web	11 gph coating/adhesive 1500 ft/min	N/A
2LB2	ETI Inc. Hot Melt Adhesive Pilot Coater, UV curing station and Corona Treaters	47 gph of coating /adhesive 500 ft/min Primary corona treater = 3kW Secondary corona treater= 6kW	N/A
2LB3	Faustel Labmaster A Pilot Coater (water or solvent or hot melt coatings) 12 inch web	9 gph coating/adhesive 98 ft/min	Plant 2 ABB Thermal Oxidizer
2LB4[2]	Hot Melt Coater and Corona Treater	71 gph coating /adhesive Corona treater = 2kW	N/A
2S01	Corona Treater	5kW	N/A
5X01	Silicone Coater and Corona Treater 80 inch web width	15 gph coating/ adhesive 120 ft/min Corona treater = 15kW	N/A
B1	Fulton Steam Boiler	0.63 MMBtu/hr	N/A
B2	Aerco Boiler (Plant 2), Model Number BMK2.0LN	2 MMBtu/hr	N/A
E1	Emergency Generator	1.85 MMBtu/hr	N/A
E2	Emergency Generator	1.38 MMBtu/hr	N/A
E3	Emergency Generator	1.38 MMBtu/hr	N/A
E4	Emergency Generator	0.97 MMBtu/hr	N/A
E5	Emergency Generator	1.38 MMBtu/hr	N/A

Table 1 Key

EU = Emission Unit
Ft/min = feet per minute
gph = gallons per hour
kW = kilowatt
MMBtu/hr = million British thermal units per hour
N/A = not applicable
NG = natural gas

Table 1 Footnote:

1. EU PS13, EU PS15, EU 2LB2, and EU 2LB5 each have a primary and secondary corona treater. EU TC2-5 has a primary, top, and bottom corona treater.
2. On April 6, 2010, FLEXcon notified the MassDEP via letter, that FLEXcon would be installing the Hot Melt Coater (2LB4). The coater is exempt from air quality Plan Approval as its potential emissions are less than 1.0 TPY.

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 3 below:

Table 3

EU	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emissions Limits / Standards [1]	Applicable Regulation(s)	Plan Approval Number
PS7	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	4.6 TPM, 23.1 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
PS9	Waterbased Coating, Substrate & Natural Gas	VOC / HAP	N/A	2.0 TPM, 10.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
PS10	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	2.7 TPM, 13.4 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
PS11	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	2.6 TPM, 13.3 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
PS12	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	4.6 TPM, 22.9 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
PS13	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	6.0 TPM, 30.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
PS14	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	4.4 TPM, 22.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
PS15	Adhesive Coating,	VOC /	N/A	4.0 TPM,	40 CFR 60, Subpart RR,	X272475

Table 3

EU	Fuel/Raw Material	Pollutant	Operational and/or Production Limits	Emissions Limits / Standards [1]	Applicable Regulation(s)	Plan Approval Number
	Substrate & Natural Gas	HAP		20.2 TPY	40 CFR 63, Subpart JJJJ	
Dye	Adhesive Coating & Substrate	VOC / HAP	N/A	0.2 TPM, 1.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
TC2-3	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	3.3 TPM, 16.7 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
TC2-4	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	2.5 TPM, 12.5 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
TC2-5	Adhesive Coating, Substrate & Natural Gas	VOC / HAP	N/A	1.9 TPM, 9.6 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
2LB1	Adhesive Coating & Substrate	VOC / HAP	N/A	0.6 TPM, 3.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
2LB2	Adhesive Coating & Substrate	VOC / HAP	N/A	0.6 TPM, 3.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
2LB3	Adhesive Coating & Substrate	VOC / HAP	N/A	1.0 TPM, 5.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
2LB4	Adhesive Coating & Substrate	VOC / HAP	N/A	<0.2 TPM, <1.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
2LB5	Adhesive Coating & Substrate	VOC / HAP	N/A	1.0 TPM, 5.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
5X01	Silicone Coating, Substrate & Natural Gas	VOC / HAP	N/A	1.0 TPM, 5.0 TPY	40 CFR 60, Subpart RR, 40 CFR 63, Subpart JJJJ	X272475
B1 – B2	Natural Gas		N/A	Work practice standards	40 CFR 63, Subpart DDDDD	X272475
E1- E4	Natural Gas		100 hours for maintenance checks	Work practice standards	40 CFR 63, Subpart ZZZZ	X272475
E5	Natural Gas		100 hours for maintenance checks	Emission standards [2]	40 CFR 60, Subpart JJJJ and 310 CMR 7.26(42)	X272475
Facility-wide	N/A	VOC	N/A	30.0 TPM, 148.0 TPY		X272475
	N/A	Single HAP	N/A	10.0 TPM, 50.0 TPY		X272475
	N/A	Total HAP	N/A	15.0 TPM, 75.0 TPY		X272475
	N/A	Ozone	N/A	1.5 TPM, 7.5 TPY		X272475
	N/A	Ammonia	N/A	1.5 TPM, 7.5 TPY		X272475
	N/A	NOx	N/A	7.1 TPM, 85.14 TPY		X272475

Table 3						
EU	**Fuel/Raw Material**	**Pollutant**	**Operational and/or Production Limits**	**Emissions Limits / Standards [1]**	**Applicable Regulation(s)**	**Plan Approval Number**
Facility-wide	N/A	Opacity	N/A	0%		X272475
	All	Greenhouse gas[3]	N/A	N/A	310 CMR 7.71 (State Only Requirement)	X272475
	N/A	CO	N/A	11.8 TPM, 70.6 TPY		X272475
	N/A	CO2	N/A	16,534 TPM, 99,322 TPY		X272475

Table 3 Key:

CO = Carbon Monoxide
CO_2 = Carbon Dioxide
CFR =code of federal regulation
CMR = code of Massachusetts regulations
Dscm = dry standard cubic meter
EU = Emission Unit
HAP = Hazardous Air Pollutant
lbs/hr = pounds per hour
lbs/MMBtu = pounds per Million British thermal units
N/A = not applicable
NH_3 = Ammonia
NO_x = Nitrogen Oxides
Opacity = exclusive of uncombined water vapor
SO_2 = Sulfur Dioxide
TPM = tons per month
TPY = tons per consecutive12-month period [2]
VOC = Volatile Organic Compounds
% = percent
≤ = less than or equal to

Table 3 Foot Notes:

1. To calculate the amount of a consecutive 12 month rolling period take the current calendar month amount and add it to the previous 11 calendar months total amount
2. A letter from the supplier stating that the engine meets the applicable non-road emission limitation will satisfy the certificate of conformity requirement.
3. 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: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to the monitoring/testing, record keeping, and reporting requirements as contained in Tables 4, 4A, 4B, 5, and 6 below and 310 CMR 7.00 Appendix C (9) and (10) and applicable requirements contained in Table 3:

Table 4

EU	Monitoring and Testing Requirements
PS7 PS10 PS11 PS12 PS13 PS14 PS15 DYE TC2-3 TC2-4 TC2-5 2LB3 2LB5	1. In accordance with Plan Approval Tr X272475, the Permittee shall calibrate the pressure transmitters on the oxidizers in accordance with the manufacturer's recommendations or at least every 6 months and conduct visual inspections of the pressure switches every month.
	2. In accordance with Plan Approval Tr X272475, the Permittee shall maintain the air flows to the oxidizers at a sufficient flow rate as to maintain the stated control efficiency whenever VOC/HAP emissions are being generated by the various coating lines tied into the unit. In the event of insufficient airflow, a pressure switch will automatically shut the oxidizer and the coating lines off.
	3. In accordance with Plan Approval Tr X272475, the Permittee shall continuously monitor the RTOs combustion zone thermocouples and LEL measurement of inlet VOC exhaust, which are recorded electronically. RTO combustion chamber temperatures shall be continuously recorded to demonstrate that it is operating at or above the set point temperature required to maintain the required destruction efficiency.
	4. In accordance with Plan Approval Tr X272475, the Permittee shall properly install, calibrate, maintain and operate monitoring equipment to ensure continuous and accurate operation at all times.
	5. In accordance with Plan Approval Tr X272475, the Permittee shall, inspect at least every three months, the RTOs parametric measurement monitoring and recording devices to ensure that they are calibrated and are properly. These devices may include but not limited to the temperature recorder and enclosure pressure transducer.
	6. In accordance with 40 CFR §60.442(a)(2), the Permittee shall, for all thermal incineration destruction devices record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test
	7. In accordance with 40 CFR 60, Subpart RR, the Permittee shall: a. demonstrate a 90 percent overall VOC emission reduction as calculated over a calendar month pursuant to 40 CFR 60.442(a)(2)(i); b. determine the performance of the solvent destruction device determined by averaging the results of three test runs as specified in §60.8(f); pursuant to 40 CFR 60.444(c), c. install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases, pursuant to 40 CFR 60.445(e),. The monitoring device shall have an accuracy of the greater of ±1 percent of the temperature being measured expressed in degrees Celsius or ±1 °C, whichever is greater. d. install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating, pursuant to 40 CFR 60.445(g); and e. use Method 25 (or Method 25A, if approved by DEP/EPA) to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere, pursuant to 40 CFR 60.446(b),. Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled gas streams. For Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.
PS7 PS10 PS11 PS12 PS13 PS14 PS15 DYE TC2-3 TC2-4 TC2-5	8. In accordance with 40 CFR 63, Subpart JJJJ, the Permittee shall: a. install, operate, and maintain a continuous parameter monitoring system (CPMS) pursuant to 40 CFR 63.3350(e). b. Pursuant to 40 CFR 63.3350(e)(9), if using an oxidizer to comply with the emission standards: i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.

Table 4

<table>
<tr><th>EU</th><th>Monitoring and Testing Requirements</th></tr>
<tr><td>2LB3
2LB5</td><td>ii. Install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 °Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
c. conduct all capture system monitoring in accordance with the developed site-specific monitoring plan, pursuant to 40 CFR 63.3350(f). Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.
d. conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in paragraphs (e)(1) and (2) of this section, pursuant to 40 CFR 63.3360(e). During the performance test, the Permittee shall establish the operating limits required by §63.3321 according to paragraph (e)(3) of this section; and
e. determine capture efficiency using the procedures in paragraph (f)(1), (2), or (3) of this section, as applicable, pursuant to 40 CFR 63.3360(f).</td></tr>
<tr><td>PS7
PS10
PS11
PS12
PS13
PS14
PS15
DYE
TC2-3
TC2-4
TC2-5
2LB3
2LB5</td><td>9. In accordance with Plan Approval Tr X272475, the Permittee shall conduct performance and emission testing to determine the capture and destruction efficiency of the control systems and to determine compliance with the emissions limits in Table 3 of this Operating Permit according to the following schedule:
<table>
<tr><th>Line Number</th><th>Plant Number</th><th>RTO Name</th><th>Testing Frequency (yr)</th><th>Efficiency %</th></tr>
<tr><td>PS7</td><td>4</td><td>Alstom</td><td>NA</td><td>99</td></tr>
<tr><td>PS10</td><td>4</td><td>Alstom</td><td>NA</td><td>99</td></tr>
<tr><td>PS11</td><td>4</td><td>Alstom</td><td>NA</td><td>99</td></tr>
<tr><td>PS12</td><td>5</td><td>DURR</td><td>5</td><td>99</td></tr>
<tr><td>PS13</td><td>5</td><td>DURR</td><td>5</td><td>99</td></tr>
<tr><td>PS14</td><td>5</td><td>ABB</td><td>NA</td><td>99</td></tr>
<tr><td>PS15</td><td>4</td><td>TANN</td><td>5</td><td>99</td></tr>
<tr><td>DYE</td><td>2</td><td>ABB</td><td>5</td><td>98</td></tr>
<tr><td>TC2-3</td><td>2</td><td>ABB</td><td>5</td><td>98</td></tr>
<tr><td>TC2-4</td><td>2</td><td>ABB</td><td>5</td><td>98</td></tr>
<tr><td>TC2-5</td><td>2</td><td>ABB</td><td>5</td><td>98</td></tr>
<tr><td>2LB3</td><td>2</td><td>ABB</td><td>5</td><td>98</td></tr>
<tr><td>2LB5</td><td>2</td><td>ABB</td><td>5</td><td>98</td></tr>
</table></td></tr>
<tr><td rowspan="4">Facility wide</td><td>10. In accordance with USEPA Test Methods and 310 CMR 7.13, the Permittee shall conduct emission Reference testing if and when MassDEP requires it.</td></tr>
<tr><td>11. In accordance with 310 CMR 7.12 Source Registration, the Permittee shall monitor all operations to ensure sufficient information is available to comply with Source Registration.</td></tr>
<tr><td>12. In accordance with Plan Approval Tr X272475, the Permittee shall, at least 60 days prior to emission testing, submit to MassDEP for approval a stack emission pretest protocol.</td></tr>
<tr><td>13. In accordance with Plan Approval Tr X272475, the Permittee shall, within 60 days after emission testing, submit to MassDEP a final stack emission test results report.</td></tr>
</table>

Table 4	
EU	**Monitoring and Testing Requirements**
Facility wide	14. In accordance with 310 CMR 7.71(1) and Appendix C (9), the Permittee shall 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).
	15. See Table 9 Alternative Operating Scenario for scenario specific monitoring/testing requirements.

Table 4 Key*:*

CO = Carbon Monoxide

CO_2 = Carbon Dioxide

CMR = code of Massachusetts regulations

dscm = dry standard cubic meter

EU = Emission Unit

gm/bhp-hr =grams per brake horsepower for one hour (engine output)

HAP (single) = single Hazardous Air Pollutant

HAPs (total) = total Hazardous Air Pollutants.

lbs/hr = pounds per hour

lbs/MMBtu = pounds per Million British thermal units

LEL = lower explosive limit

NH_3 = Ammonia

NO_x = Nitrogen Oxides

Opacity = exclusive of uncombined water vapor

RTO = regenerative thermal oxidizer

SF6 = sulfur hexafluoride

SO_2 = Sulfur Dioxide

TPM = tons per month

TPY = tons per consecutive12-month period [2]

VOC = Volatile Organic Compounds

% = percent

≤ = less than or equal to

^0C = degrees Celsius

^0F = degrees Fahrenheit

Table 4A			
Compliance Assurance Monitoring 40 CFR 64 – RTOs			
Indicator	Combustion zone temperature	Fan differential pressure	Main blower fan frequency
Measurement Approach	Thermocouples	Differential pressure transmitter	Frequency (Hz) monitor
Indicator Range	An excursion is any consecutive 3-hour period of operation when the average combustion zone temperature falls greater than 50^0 below the RTOs compliance temperature, which was established during its most recent performance test.	An excursion is a pressure reading greater or equal to 25 inches water column to determine the resistance to flow.	An increasing trend resulting in a value greater than 50Hz fan speed.
Monitoring Method(s)	FLEXcon monitors the combustion zone temps by completing audits of the temperature recorders, monitoring the facility MES process screens, and with audible alarms and email notifications to alert of low temperature conditions.	Fan differential pressure is monitored through the facility MES as well as during monthly oxidizer inspections.	The main blower fan is monitored through the facility MES as well as during monthly oxidizer inspections.
Data Representativeness	Thermocouple range is -328 to 2282 ^{0} F. The digital data logger records temperature to 0.1^0F. Thermocouples have an accuracy level of < 1 percent. Thermocouples will fail safe to an over temp condition, which will shut down the RTO (and the coating machines) & MES would send out an oxidizer fault email to key personnel.	Transmitter range is 0 -30 inches of water column. MES records pressure to 0.1 inches.	A frequency monitor with a range of 0-60 Hz has a 0.5 Hz tolerance. MES records pressure to 0.1 Hz.
QA/QC Practices and Criteria	The temperature recorder is calibrated quarterly.	The unit will go into a fault state if pressure is not maintained.	Air flow switches are monitored & if stop will shut down machines.
Monitoring frequency	Continuous/every minute	Continuous/every minute	Continuous/every minute
Data Collection Procedure	Value recorded continuously by digital data logger and MES.	Value recorded continuously by MES.	Value recorded continuously by MES.
Averaging period	3-hour rolling average	NA	NA

Table 4A Key

^{0}F = degrees Fahrenheit
> = greater than
< = less than
CFR = Code of Federal Regulations
Hz = hertz
MES = Manufacturing Execution System
NA = Not Applicable
RTO = Regenerative Thermal Oxidizer

Table 4B	
Compliance Assurance Monitoring 40 CFR 64-VOC Emissions Capture	
Indicator	Coating enclosure differential pressure
Measurement Approach	The differential pressure is monitored in inches of water column within the coating enclosures of machines processing solvent based adhesives.
Indicator Range	An excursion is defined as any consecutive 3-hour period of operation when the average differential pressure is less than negative (-) 0.007 inches water, which equates to 200 fpm in accordance with EPA Method 204.
Data representativeness	The differential pressure transducer is located outside of the coating enclosure and has a resolution of 0.001 inches water.
QA/QC Practices and Criteria	The differential pressure transducer is calibrated on a quarterly basis.
Monitoring Frequency	Continuous/every minute
Data Collection Procedure	Value recorded continuously by digital data logger and MES.
Averaging period	3-hour rolling average

Table 4B Key

EPA = Environmental Protection Agency
MES = Manufacturing Execution System
fpm = feet per minute

Table 5	
EU	**Record Keeping Requirements**
PS7 PS9 PS10 PS11 PS12 PS13 PS14 PS15 DYE TC2-3 TC2-4 TC2-5 2LB1 2LB2 2LB3 2LB4 2LB5 5X01	1. In accordance with 40 CFR 60, Subpart RR, the Permittee shall: a. continuously record the destruction device combustion temperature for lines that are controlled during solvent-based coating operations and shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with 40 CFR §60.442(a)(2); pursuant to 40 CFR 60.443(e), b. maintain a calendar month record of all coatings used and the results of the reference test method specified in §60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings; pursuant to 40 CFR 60.445(a), c. maintain a 12-month record of the amount of solvent applied in the coating at the Facility; pursuant to 40 CFR 60.445(d), and d. retain records of the measurements required in §§60.443 and 60.445 for at least two years following the date of the measurements, pursuant to 40 CFR 60.445(h).
E1 – E4	2. In accordance with 40CFR 63.6655, the Permittee shall maintain records of engine operation and maintenance conducted on the engines as required by for 5 years.
E5	3. In accordance with 310 CMR 7.26(42)(f) (1) through (4), the Permittee shall maintain records including information on the type, make, model and rated power output of the engine.
	4. In accordance with 40CFR 60.4245, the Permittee shall maintain records of engine operation and maintenance conducted on the engines as required for 5 years.

Table 5	
EU	**Record Keeping Requirements**
E5	5. In accordance with 40 CFR 60.4245 (a)(3), the Permittee shall maintain copies of the manufacturer certification to applicable emission standards,
B1 – B2	6. The Permittee shall keep a copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or annual compliance report that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv), in accordance with 40 CFR 63.7555(a)(1).
	7. In accordance with 40 CFR 63.7555, the Permittee shall maintain records as required for at least 5 years.
Facility-Wide	8. The Permittee shall prepare and maintain daily records sufficient to demonstrate compliance consistent with the applicable averaging time stated in 310 CMR 7.18(2)(a). Records shall be maintained on site for five years from date of generation and shall be made available to representatives of the Department and EPA. Such records shall include but are not limited to: a. Identity, quantity, formulation, and density of coating(s) used b. Identity, quantity, formulation, and density of diluent(s) used and c. Identity and quantity of gallons of clean up solvent(s) using a mass balance inventory system d. Solids content of any coating(s) used e. Actual operational and emissions limits of the coating line and any associated emissions capture and control equipment f. Quantity of product processed g. Any other requirements specified by the Department in any approval(s) and/or order(s)
	9. In accordance with Plan Approval X272475, the Permittee shall track and record ozone emissions from the facility's corona treaters monthly and on a 12 month rolling basis.
	10. In accordance with Plan Approval X272475, the Permittee shall track and record ammonia emissions monthly and on a 12 month rolling basis.
	11. In accordance with Plan Approval X272475, the Permittee shall maintain a record of routine maintenance activities performed on the approved EUs, PCDs and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time work was completed.
	12. In accordance with Plan Approval X272475, the Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates (i.e. in excess of permitted limits) on the approved EU(s), PCD(s), and monitoring equipment. At a minimum, the records shall include: a. Date and time the malfunction occurred; b. Description of the malfunction; c. Corrective actions taken; d. The date and time corrective actions were initiated and completed; and e. The date and time emission rates and monitoring equipment returned to compliant operation.
	13. In accordance with Plan Approval X272475, the Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 3, above. 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/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping
	14. In accordance with 310 CMR 7.00: Appendix C(10)(b), the Permittee shall maintain records of all monitoring data and supporting information required by this Operating Permit on site for five (5) years from the date of the monitoring sample, measurement, report or Operating Permit Renewal Application.
	15. in accordance with 310 CMR 7.13 and 40 CFR Part 60, Appendix A, the Permittee shall maintain the test results of any Emissions Compliance Testing (Stack Testing) performed or of any other testing required

Table 5	
EU	**Record Keeping Requirements**
	by MassDEP or USEPA.
Facility-Wide	16. The Permittee shall keep copies of Source Registration and other information submitted to MassDEP to comply with 310 CMR 7.12, shall be retained by the facility owner or operator for five years from the date of submittal.
	17. The Permittee shall maintain records of monitoring and testing as required by Table 4.
	18. In accordance with Plan Approval X272475, the Permittee shall make records available to MassDEP and USEPA personnel upon request.
	19. See Table 9 Alternative Operating Scenario for scenario specific recordkeeping requirements.
	20. In accordance with 310 CMR 7.00: Appendix C(10)(g), the Permittee shall, contemporaneously with making a change authorized by this Operating Permit from one alternative operating scenario to another, shall record the scenario under which it is operating in the facility Manufacturing Execution System (MES). The Permittee shall record changes from one scenario to another contemporaneously with the change.
	21. 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 5 Key

CFR = Code of Federal Regulations
CMR = Code of Massachusetts Regulations
EU = Emission Unit
PCD = Pollution Control Device
USEPA = United States Environmental Protection Agency
^{0}C = degrees Celsius
^{0}F = degrees Fahrenheit

Table 6	
EU	**Reporting Requirements**
PS7 PS10 PS11 PS12 PS13 PS14 PS15 DYE TC2-3 TC2-4 TC2-5 2LB3 2LB5	1. In accordance with 40 CFR 60, Subpart RR, the Permittee shall: a. submit the performance test data & results from the performance test to the Administrator as specified in §60.8(a) of the General Provisions (40 CFR part 60, subpart A); pursuant to 40 CFR 60.447(a), b. following the initial performance test, submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in §60.442, pursuant to 40 CFR 60.447(b),. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually; and c. submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.443(e), pursuant to 40 CFR 60.447(c). If no such periods occur, the owner or operator shall state this in the report. Pursuant to 40 CFR 60.7, all reports shall be postmarked by the 30th day following the end of each six-month period.
	2. In accordance with 40 CFR 63, Subpart JJJJ, the Permittee shall: a. submit a semiannual compliance report according to paragraphs (c)(1) and (2) of this section; Pursuant to 40 CFR 63.3400(c), and. b. submit startup, shutdown, and malfunction reports as specified in §63.10(d)(5). Pursuant to 40 CFR 63.3400(g),

Table 6	
EU	**Reporting Requirements**
B1 – B2	3. In accordance with 40 CFR 63.7545 and Table 8, the Permittee shall submit Notification of Compliance Status reports to the DEP and EPA within 60 days of completion of the required compliance demonstrations.
	4. In accordance with 40 CFR 63.7550, the Permittee shall submit compliance reports to the DEP and EPA every 5-years.
Facility-wide	5. The Permittee shall submit to MassDEP all information required by this Operating Permit 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).
	6. In accordance with Plan Approval X272475, the Permittee shall notify MassDEP when a corona treater is being replaced or added.
	7. In accordance with 310 CMR 7.13(1) and 7.13(2), the Permittee shall cause such stack testing to be summarized and submitted to MassDEP as prescribed in the agreed to pretest protocol if determined by MassDEP that stack testing is necessary to ascertain compliance with the Department's regulations or design approval provisos.
	8. 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), in accordance with 310 CMR 7.00: Appendix C(10)(c).
	9. In accordance with 310 CMR 7.12, the Permittee shall submit a Source Registration/Emission Statement Form to MassDEP on an annual basis.
	10. In accordance with 310 CMR 7.00 Appendix C(10)(a), the Permittee shall upon MassDEP's request, submit any record relevant to the Operating Permit or to the emissions of any air contaminant to the Department within 30 days of the request or longer, if approved by MassDEP,
	11. In accordance with 310 CMR 7.00: Appendix C(10)(f), the Permittee shall report to MassDEP all instances of deviations from Permit requirements (including but not limited to testing for efficient operation, emission limitations/standards, Standard Operating and Maintenance Procedures) by telephone, email, or fax, within three days of discovery of such deviation, (See General Condition 25 of this Operating Permit).
	12. In accordance with General Condition 10 of this Operating Permit, the Permittee shall submit the Annual Compliance report to MassDEP and EPA by January 30 of each year.
	13. 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).
	14. See Table 9 Alternative Operating Scenario for scenario specific reporting requirements.

Table 6 Key

CFR = Code Of Federal Regulations
CMR = Code Of Massachusetts Regulations
EPA = Environmental Protection Agency
EU = Emission Unit
MassDEP = Massachusetts Department of Environmental Protection
PCD = Pollution Control Device

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
NA	NA

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 Table 3, 4, 4A, 4B, 5, and 6:

Table 8.

EU	Special Terms and Conditions
PS7 PS9 PS10 PS11 PS12 PS13 PS14 PS15 DYE TC2-3 TC2-4 TC2-5 2LB1 2LB2 2LB3 2LB4 2LB5 5X01	1. In accordance with 40 CFR 63, Subpart JJJJ , the Permittee shall: a. Limit HAP emission using one of the four options listed at 40 CFR 63.3320. FLEXcon implements option four which states: If you use an oxidizer to control HAP emissions, operate it such that an outlet organic HAP concentration of not greater than 20 ppm by volume by compound on a dry basis is achieved & the efficiency of the capture system is 100%, b. For the units that are using a control device, demonstrate compliance with 40 CFR 63 subpart JJJJ by installing and continuously operating the use of air pollution control equipment and Permanent Total Enclosure (PTE), c. Maintain a Site Specific Monitoring (SSM) Plan that describes how the Facility will document compliance with 40 CFR 63 subpart JJJJ. This plan must be maintained onsite and be updated annually, d. If controlling the line, ensure that the RTO is operated with a permanent total enclosure (100% capture efficiency), e. Utilize bypass stacks (to bypass the pollution control devices) for emergency purposes or when compliant coatings containing low-VOC/are being used. Compliant coatings are aqueous based solutions of polymer resins with less than 4% of VOC/HAP by weight (kg organic HAP/kg coating material), as applied, f. Utilize coatings that are compliant with 40 CFR 63.3370(n) and (o), g. Continuously monitor and record when the air pollution control equipment is off line and bypassed due to an emergency and when compliant coatings are in use, h. For lines being controlled, ensure that the outlet organic HAP concentration at the RTO is <20 ppm, i. Operate and maintain source and control equipment consistent with good air pollution practices pursuant to 40 CFR 63.6(e)(1), j. Develop and implement a written start-up, shutdown, and malfunction plan (SSMP) for affected

Table 8.

EU	Special Terms and Conditions
	source and control equipment, k. For controlled lines, maintain a rolling 3-hour average combustion zone temperature at or above that demonstrated during the compliance test pursuant to 40 CFR 63.3350(e) and 63.3360(e)(ii).
PS7 PS10 PS11 PS12 PS13 PS14 PS15 DYE TC2-3 TC2-4 TC2-5 2LB3 2LB5	2. In accordance with 40 CFR 63, Subpart JJJJ, if the Permittee is using a control device, the Permittee shall: a. Conduct the initial performance test within 180 days of control equipment start up pursuant to 40 CFR 63.7(a), b. Notify the administrator of the test at least 60 days in advance pursuant to 40 CFR 63.7(b), c. Development , and if requested, submittal of the test plan at least 60 days in advance of the test pursuant to 40 CFR63.7(c), d. Performance tests shall be conducted under normal operating condition pursuant to 40 CFR 63.7(e), e. Determine capture efficiency in accordance with applicable requirements. The Permittee may assume capture efficiency of 100% if the capture system is a permanent total enclosure (PTE). The Permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of Section 6 of EPA Method 204 of 40 CFR part 51, Appendix M and that all exhaust gases from the enclosure are delivered to a control device, f. Develop a written Site-Specific Monitoring Plan for the source, control system and monitoring system pursuant to 40 CFR 63.6(e)(3)(v). g. Maintain specified records for at least 5 years pursuant to 40 CFR 63.10(b)(1) and 63.10(b)(2). h. Maintain specified records for the facility's Continuous Monitoring Systems (CMSs) pursuant to 40 CFR 63.10(c). i. Submit an initial notification within 1 year of the compliance date pursuant to 40 CFR 63.3400(b)(1). j. Submit a semi-annual compliance report pursuant to 40 CFR 63.3400(c). k. Submit performance test reports within 60 days of the completion of the test to the Administrator pursuant to 40 CFR 63.7(g) and 63.3400(f), and l. Submit all start-up, shutdown or malfunction reports to the Administrator pursuant to 40 CFR 63.3400(g).
PS7 PS10 PS11 PS12 PS13 PS14 PS15 DYE TC2-3 TC2-4 TC2-5 2LB3 2LB5	3. In accordance with Plan Approval X272475, the Permittee shall ensure that continuous monitoring of the RTOs shall include a combustion zone thermocouple and LEL measurement of inlet VOC exhaust, which are recorded electronically. Thermal oxidizers combustion chamber temperatures shall be continuously recorded to demonstrate that it is operating at or above the set point temperature required to maintain the following percent of destruction efficiency for each oxidizer: a) Plant 2 ABB = 98% b) Plant 4 Alstom = 99% c) Plant 4 TANN = 99% d) Plant 5 ABB = 99% e) Plant 5 DURR = 99%
PS9	4. In accordance with Plan Approval X272475 and 40 CFR 63.3320(b)(2), the Permittee shall run only water based coatings which are defined as coatings consisting of aqueous solutions of polymer resins with less than 4% VOC/HAP by weight.
PS10 PS11 PS12 PS13 PS14	5. In accordance with 40 CFR 63.3350, the Permittee shall record parameters related to possible air pollution control equipment bypass and coating use on lines that are "intermittently- controlled workstation" or have the ability to run controlled or uncontrolled. The Permittee must continuously record the position of the damper: when it is in the water mode (bypass stack in use) or in the solvent mode (when the oxidizer is in use).
E1 – E4	6. In accordance with 40 CFR 63.6625(f), the Permittee shall equip each of the subject reciprocating internal combustion engines (RICE) with a non-resettable hour meter.

Table 8.	
EU	**Special Terms and Conditions**
E1 – E4	7. In accordance with 40 CFR 63.6602 and 63.6603, the Permittee shall comply with the work practice requirements listed therein: 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) c. Inspect all hoses and belts every 500 hours of operation or annually (whichever comes first)
	8. In accordance with 40 CFR 63.6625(e), the Permittee shall operate and maintain the stationary RICE 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 for minimizing emissions.
	9. In accordance with 40 CFR 63.6640(f)(ii), the Permittee shall ensure that maintenance checks and readiness testing of the emergency generators are limited to 100 hours per year.
E5	10. In accordance with 40 CFR 60.4243(d), the Permittee shall ensure that maintenance checks and readiness testing of the emergency generator are limited to 100 hours per year.
	11. In accordance with 40 CFR 60.4245(b), the Permittee shall equip the stationary SI emergency ICE with a non-resettable hour meter.
	12. In accordance with the manufacturer's emission-related written instructions, the Permittee shall maintain the certified stationary SI internal combustion engine.
B1 – B2	13. In accordance with 40 CFR 63.7540(a), the Permittee shall conduct a tune-up of the boiler or process heater every 5 years as specified in
B1	14. In accordance with 40 CFR 63.7540(a), the Permittee shall have a one-time energy assessment performed by a qualified energy assessor.
All EUs except for PS 9	15. In accordance with 40 CFR 63.1-15, Subpart A, "General Provisions", the Permittee shall comply with all applicable provisions required therein.
Facility-wide	16. In accordance with Plan Approval X272475, the Permittee shall perform preventative maintenance on all corona treaters semi-annually.
	17. The Permittee is subject to, and has stated in their Operating Permit application, Transmittal No X223989, that the Permittee is in compliance with the requirements of 40 CFR 82: Protection of Stratospheric Ozone. These requirements are applicable to this facility and the United States Environmental Protection Agency enforces these requirements.

Table 8 Key

CFR = Code Of Federal Regulation
CMR = Code Of Massachusetts Regulations
EU = Emission Unit
HAP = hazardous air pollutant
ICE =internal combustion engine
PCD = Pollution Control Device
SI = spark ignition
USC = United States Code
USEPA = Unites States environmental protection agency
VOC = volatile organic compound

6. ALTERNATIVE OPERATING SCENARIOS

Table 9.	
EU	**Alternative Operating Scenarios**
PS7 PS10 PS11 TC2-3 TC2-4 TC2-5 2LB3 2LB5 DYE	1. While operating under an Alternative Operating Scenario (AOS), the Permittee shall comply with all applicable requirements specified in this Permit, including but not limited to, state and federal operational and emission limitations specified in Table 3, monitoring and testing requirements specified in Table 4, recordkeeping requirements specified in Table 5, reporting requirements in Table 6 and special terms and conditions contained in Table 8. The Permittee shall establish and maintain a log at the Facility, which indicates the scenario under which the Facility is operating. The Permittee shall record changes from one scenario to another contemporaneously with the change, as provided in 310 CMR 7.00: Appendix C (10)(g).
PS7 PS10 PS11	2. Alternative Operating Scenario for the Plant 4 Alstom oxidizer: The Permittee shall run both beds of the Plant 4 Alstom oxidizer under full load conditions and have the ability to run a single bed under low load conditions. Low load condition is defined as running 1 or 2 machines while full loading is defined as 3 or more machines.
TC2-3 TC2-4 TC2-5 2LB3 2LB5 DYE	3. Alternative Operating Scenario for the Plant 2 ABB oxidizer: The Permittee shall run both beds of the Plant 2 ABB oxidizer under full load conditions and have the ability to run a single bed under low load conditions. Low load condition is defined as running 1 or 2 machines while full loading is defined as 3 or more machines.

Table 9 Key

EU = Emission Unit PCD = Pollution Control Device

7. EMISSIONS TRADING

A. INTRA-FACILITY EMISSION TRADING

The Permittee did not request intra-facility emissions trading in its Operating Permit application.

A. 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 Air Compliance Clerk, 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 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

affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

A. an emergency occurred and that the Permittee can identify the cause(s) of the emergency;

B. the permitted Facility was at the time being properly operated;

C. during the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and

D. the Permittee submitted notice of the emergency to the MassDEP within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response, immediate notification to the appropriate parties should be made as required by law.

25. PERMIT DEVIATION

Deviations are instances where any permit condition is violated and not reported as an emergency pursuant to section 24 of this Permit. Reporting a permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements listed in Table 6 of this Operating Permit shall supersede the following deviation reporting requirements, if applicable.

The Permittee shall report to the MassDEP's Regional Bureau of Air and Waste the following deviations from permit requirements, by telephone, by fax or by 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 this 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, this Operating Permit, or other approvals.

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

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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.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the MassDEP Bureau of Air and Waste Air Operating Permit Reporting Kit, which is available to the Permittee via the MassDEP's web site, http://www.mass.gov/dep/air/approvals/aqforms.htm#op. This report shall include the deviation, including those attributable to upset conditions as defined in the Permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone, fax or electronic mail (e-mail) within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Air and Waste within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The Permittee is allowed to make changes at the Facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the Permit and in compliance with all applicable requirements provided the Permittee gives the EPA and the MassDEP written notice fifteen (15) 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.

This 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) and a completed Adjudicatory Hearing Fee Transmittal Form, http://www.mass.gov/eea/docs/dep/service/adr/adjherfm.doc 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.