



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WESTERN REGIONAL OFFICE

436 Dwight Street • Springfield, Massachusetts 01103 • (413) 784-1100 • FAX (413) 784-1149

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

STEPHEN R. PRITCHARD
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

March 3, 2006

Ida McDonnell, CAP
USEPA Region 1
1 Congress Street; Suite 1100
Boston, Massachusetts 02114-2023

Re: **Minor Modification**
FINAL OPERATING PERMIT
Source No.: 130255
Appl. #1-O-06-003; Trans.# W070826

At: ExxonMobil Oil – Springfield Terminal
145 Albany Street
Springfield, MA 01105

Dear Ms. McDonnell:

In accordance with 310 CMR 7.00 - APPENDIX C(6) of the Massachusetts Air Pollution Control Regulations ("the Regulations"), the Department of Environmental Protection ("MassDEP") is forwarding to EPA and affected states the attached **Minor Modification** to the Final Operating Permit for ExxonMobil Oil – Springfield Terminal located at 145 Albany Street in Springfield, Massachusetts.

The attached **Minor Modification** to the Final Operating Permit is for the conversion of the Springfield terminal from MTBE to denatured ethanol as the gasoline oxygenate. The ethanol will be stored in any of the six existing gasoline storage tanks and will be added to the gasoline at the truck loading racks. The increase in potential fugitive VOC emissions from the added fugitive emissions components (valves, flanges, pumps, etc.) will be less than one ton per year.

There are no changes to any of the requirements of the Operating Permit, but it is being reissued with corrections of typographical errors, formatting changes, and with the change of the facility contact person.



If you have any questions concerning this **Minor Modification** to the Final Operating Permit, please contact John Kirzec at (413) 755-2225 at your earliest convenience.

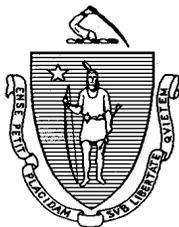
Sincerely,

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.

Craig Goff
Permit Chief
Bureau of Waste Prevention
Western Region

JK/jk
exxonmobil final op-minormod 2006-03-03.doc

cc: Tom Budde, Field Environmental Advisor
ExxonMobil – East Providence Terminal
1001 Wampanoag Trail
East Providence, RI 02915



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AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("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"]:

ExxonMobil Oil Corporation
145 Albany Street
Springfield, MA 01105

INFORMATION RELIED UPON:

Application No. : 1-O-98-034
Transmittal No. : W002564
Minor Mod Appl.#1-O-06-003; Trans. # W070826

FACILITY LOCATION:

ExxonMobil Oil – Springfield Terminal
145 Albany Street
Springfield, MA 01105

FACILITY IDENTIFYING NUMBERS:

SSEIS ID: 042/0202
FMF FAC NO.: 130255
FMF RO NO.: 50132

NATURE OF BUSINESS:

light fuel products storage/distribution facility

RESPONSIBLE OFFICIAL:

Name: Michael DiCenso
Title: Terminal Supervisor

FACILITY CONTACT PERSON:

Name: Michael DiCenso
Title: Terminal Supervisor
Phone: (413) 736-1881

This operating permit shall expire on June 21, 2007.

For the Department of Environmental Protection, Bureau of Waste Prevention

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

Michael Gorski
Regional Director
Department of Environmental Protection
Western Regional Office

March 3, 2006
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 (hereinafter “ExxonMobil-Springfield”) is authorized to operate the air emission units as shown in Table 1 and exempt 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.

DESCRIPTION OF FACILITY AND OPERATIONS

ExxonMobil's Springfield terminal is a light fuel products (gasoline and distillate oil) storage and distribution facility. It operates 10 large above-ground storage tanks which receive petroleum products via pipeline. Product is then dispensed at a loading rack into tanker trucks for distribution. There are also 5 smaller additive tanks and a John Zink vapor combustion unit at the facility. The ExxonMobil Springfield terminal operates under a Compliance Assurance Monitoring (CAM) plan approved by the MassDEP on June 3, 2000 in accordance with the requirements of 40 CFR Part 64.

2. EMISSION UNIT IDENTIFICATION

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

Table 1			
Emission Unit	Description of Emission Unit	EU Design Capacity	Pollution Control Device
EU 1	Truck loading rack & Vapor Combustion Unit	564,000,000 gallons gasoline/year 180,000,000 gallons distillate/year	Vapor balance & Vapor combustion unit (VCU)
EU 2	Gasoline/ethanol storage tank #11	297,570 gallons	Internal floating roof
EU 3	Gasoline/ethanol storage tank #12	296,016 gallons	Internal floating roof
EU 4	Gasoline/ethanol storage tank #13	433,062 gallons	Internal floating roof
EU 5	Gasoline/ethanol storage tank #14	1,356,852 gallons	Internal floating roof
EU 6	Gasoline/ethanol storage tank #32	4,052,300 gallons	Internal floating roof Primary and secondary seals
EU 7	Gasoline/ethanol storage tank #33	792,960 gallons	Internal floating roof
EU 8	Distillate storage tanks #16 #17 #29 #31	231,336 gallons 231,210 gallons 696,612 gallons 3,724,434 gallons	None None Internal floating roof None

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.	310 CMR 7.00:Appendix C(5)(h)

4. APPLICABLE REQUIREMENTS

A. EMISSION LIMITS AND RESTRICTIONS – The Permittee is subject to the emission limits/restrictions as contained in Table 3 below:

Table 3				
EU #	Fuel or Raw Material	Pollutant	Emission Limit/Standards/Restrictions	Applicable Regulation and/or Approval No.
EU 1	Organic Liquid ⁽¹⁾ with Vp ≥ 1.5 psia & Distillate oil	VOC / HAP	≤ 10 milligrams VOC per liter of organic liquid ⁽¹⁾ loaded ⁽²⁾ ≥ 95% VOC destruction efficiency	DEP Permit #1-P-96-047 (10/8/96) 40 CFR Part 60 Subpart XX 40 CFR Part 64
			(Gasoline) ≤ 47,000,000 gallons/calendar month; ≤ 564,000,000 gallon/year ⁽³⁾	
			(Distillate) ≤ 9,400,000 gallons/calendar month (June 1 – October 31) ≤ 19,000,000 gallons/calendar month (November 1– May 31) ≤ 180,000,000 gallons/year ⁽³⁾	
EU 2-7	Organic Liquid ⁽¹⁾ with Vp ≥ 1.5 psia	VOC / HAP		DEP Permit # 1-P-99-006 (6/3/99) 310 CMR 7.24
EU 8	Distillate oil	VOC / HAP		DEP Permit # 1-P-99-006 (6/3/99) 310 CMR 7.24
Facility Wide	Organic Liquid ⁽¹⁾ with Vp ≥ 1.5 psia & Distillate Oil	VOC / HAP	≤ 9.9 tons/year ⁽³⁾ single HAP ≤ 24.9 tons/year ⁽³⁾ total HAP	DEP Permit # 1-P-99-006 (6/3/99) 310 CMR 7.24
	Any	Smoke	No. 1 of the Chart no more than 6 minutes during any one hour, no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)

Table 3 key:

- Footnotes:**
- (1) typically gasoline or ethanol (also "organic liquid")
 - (2) over a six hour period, as determined by the reference method and test procedures found in Title 40 CFR 60.503(c) and 60.503(d).
 - (3) rolling 12 month total

Definitions: Chart = the Ringelmann Scale for grading the density of smoke

- Vp = vapor pressure
- psia = pounds per square inch absolute
- VOC = volatile organic compound
- HAP = hazardous air pollutant

B. COMPLIANCE DEMONSTRATION – The Permittee is subject to the monitoring, testing, recordkeeping, and reporting requirements as contained in Table 4, 5, and 6 below and 310 CMR 7.00 Appendix C (9) and (10) and applicable requirements as contained in Table 3, unless otherwise specified below.

Table 4a	
Emission Unit	Monitoring/Testing Requirements
EU 1	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with 40 CFR Part 64 and the facility's Compliance Assurance Monitoring Plan dated 6/3/2000, monitor for the existence of a pilot flame (with the vapor combustion unit's (VCU) flame sensor) at the VCU burner during loading operations. If a pilot flame is not present during loading operations, an alarm will be generated and recorded, and the loading rack will be shutdown. 2) In accordance with 40 CFR Part 64 and the facility's Compliance Assurance Monitoring Plan dated 6/3/2000, monitor for operation of the combustion air fan during loading operations. If the combustion air fan is not operating during loading operations, an alarm will be generated and recorded, and the loading rack will be shutdown. 3) In accordance with DEP Approval 1-P-96-047 (10/8/96), 40 CFR Part 64, and the facility's Compliance Assurance Monitoring Plan dated 6/3/2000, test and verify, at least once per calendar year, using a qualified independent service contractor, that the VCU system controls, including flame sensor and combustion air fan sensor, are operational. System controls will be tested in accordance with the manufacturer's recommendations to verify system shutdown upon the sensor indicating the pilot flame is not lit, or the combustion air fan is not operating. Testing will include proper operation of all controls related to unit shutdowns and corresponding interlock shutdown of the loading rack. 4) In accordance with 310 CMR 7.24(4) and 40 CFR 60.502(e), obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck which is to be loaded at the affected facility. 5) In accordance with 40 CFR 60.502(e)(3)(i), cross-check each tank identification number obtained in accordance with 40 CFR 60.502(e)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: <ol style="list-style-type: none"> a) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation, then the documentation cross-check shall be performed each quarter; or b) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation, then the documentation cross-check shall be performed semiannually. 6) In accordance with 40 CFR 60.502(e)(ii), if either the quarterly or semiannual cross-check provided in provision 5 above reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met. 7) In accordance with 40 CFR 60.502(e)(4), notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in 40 CFR Part 60.502(e)(3).

Table 4b

Emission Unit	Monitoring/Testing Requirements
EU 1 (continued)	<p>ExxonMobil-Springfield shall</p> <p>8) In accordance with 40 CFR 60.502(e)(5), take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.</p> <p>9) In accordance with 40 CFR 60.502(j), inspect each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline, during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.</p> <p>10) In accordance with 40 CFR 60.503(a), in conducting the performance tests required in 40 CFR 60.8, use as reference methods and procedures the test methods in 40 CFR Part 60; Appendix A or other methods and procedures as specified in this section, except as provided in 40 CFR 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply.</p> <p>11) In accordance with 40 CFR 60.503(b), immediately before the performance test required to determine compliance with 40 CFR 60.502 (b), (c), and (h), use 40 CFR Part 60 Appendix A, Method 21 to monitor for leakage of vapor at all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.</p> <p>12) In accordance with 40 CFR 60.503(c), determine compliance with the standards in 40 CFR 60.502 (b) and (c) in accordance with the procedures specified in 40 CFR 60.503(c) (1) - (7).</p> <p>13) In accordance with 40 CFR 60.503(d), determine compliance with the standard in 40 CFR 60.502(h) in accordance with the procedures specified in 40 CFR 60.503(d) (1) and (2).</p>
EU 2-7	<p>ExxonMobil-Springfield shall</p> <p>1) In accordance with 7.24(1)(d)1., 2., 6., and 7., inspect the floating roof, seal, and secondary seals, ensuring that</p> <ul style="list-style-type: none"> a) there are no visible holes, tears, or other openings in the seal(s) or seal fabric; and, b) the seal(s) is intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall; and, c) an inspection of internal floating roofs is conducted through the roof hatches monthly; and, d) an inspection of cover and seal for internal floating roofs is conducted whenever the tank is emptied for non-operational reasons or once every five years in the case of a double seal system and once every ten years in the case of a single seal system, whichever is sooner.

Table 4c

Emission Unit	Monitoring/Testing Requirements
Facility-Wide	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with 310 CMR 7.13 <u>Stack Testing</u>, conduct stack/emission testing, upon written request of the MassDEP, for any air contaminant for which the MassDEP has determined testing is necessary, to ascertain compliance with the MassDEP's regulations or design approval provisos. All such testing shall be conducted in accordance with 310 CMR 7.13 (1) and (2), and in accordance with the applicable procedures specified in 40 CFR 60 Appendix A or other method if approved by the MassDEP and EPA. <p style="margin-left: 40px;">In accordance with 310 CMR 7.00 Appendix C(9)(b), any emission testing to demonstrate compliance with the allowable opacity emission limits shall be in accordance with EPA Method 9 for smoke/opacity, as specified in 40 CFR 60, Appendix A.</p> <p style="margin-left: 40px;">Any fuel sampling and testing required by the MassDEP, upon written request, shall be conducted in accordance with ASTM Method D4177, ASTM Method D4057, ASTM Method D323 or any other method approved by the MassDEP and EPA.</p> 2) In accordance with Regulation 310 CMR 7.24(4)(b), shall operate the vapor collection and disposal system, vapor balance system, and any appurtenant loading equipment in a vapor-tight manner that prevents: <ol style="list-style-type: none"> a) gauge pressure from exceeding 18 in. of H₂O and vacuum from exceeding six in. of H₂O in the tank truck; and, b) a reading equal to or greater than 100% of the lower explosive limit (LEL, measured as methane) at one inch from all points of the perimeter of a potential leak source during transfer operations at the loading rack or stationary tank; and, c) visible liquid leaks during loading at the loading rack or unloading at the stationary tank. 3) In accordance with Regulation 310 CMR 7.24(4)(d), the MassDEP may, at any time, test any vapor recovery system, or any tank truck at the vapor recovery system (as part of the vapor recovery system test) to determine compliance with the requirements of 310 CMR 7.24(4)(b). 4) In accordance with 310 CMR 7.24(5)(b), provide to any employee of the MassDEP a sample or samples of gasoline from said gasoline marketing facility in accordance with the test methods listed in 310 CMR 7.24(5)(b)2. 5) In accordance with 310 CMR 7.24(5)(b), allow any employee of the MassDEP to determine compliance with 310 CMR 7.24 through an audit of RVP test results provided by the supplier or through fuel sampling and testing.

Table 5

Emission Unit	Recordkeeping Requirements
EU 1	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with DEP Approval #1-P-96-047 (10/8/96) and 40 CFR 60.505(a), keep on file at the terminal in a permanent form the tank truck vapor tightness documentation required under §60.502(e)(1), and make these records available for inspection upon request. 2) In accordance with 40 CFR 60.502(e)(2), the owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. 3) In accordance with DEP Approval #1-P-96-047 (10/8/96) and 40 CFR 60.505(c), keep on file at the terminal for a minimum of 5 years a record of each monthly leak inspection required under §60.502(j), and make these records available for inspection upon request. 4) In accordance with 40 CFR Part 64 and the facility's Compliance Assurance Monitoring Plan dated 6/3/2000, keep records of the alarms that shut down the loading rack (flame sensor alarm and/or combustion air fan alarm). 5) In accordance with 40 CFR 60.505(a), keep the tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) on file at the terminal in a permanent form available for inspection. 6) In accordance with 40 CFR 60.505(c), keep on file at the terminal for at least 5 years a record of each monthly leak inspection required under 40 CFR 60.502(j) . Inspection records shall include, as a minimum, the following information: <ol style="list-style-type: none"> a) Date of inspection. b) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). c) Leak determination method. d) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). e) Inspector name and signature. 7) In accordance with 40 CFR 60.505(d), keep documentation of all notifications required under 40 CFR 60.502(e)(4) on file at the terminal for at least 5 years. 8) In accordance with 40 CFR 60.505(f), keep records of all replacements or additions of components performed on an existing vapor processing system for at least 5 years.
EU 2-7	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with 310 CMR 7.24(1)(i), not store, hold or otherwise transfer the organic liquid in the storage tank unless records are prepared, maintained and kept on-site for a minimum of five years, of: <ol style="list-style-type: none"> a) the average monthly storage temperature; b) the true vapor pressure, monthly throughput and type of organic material stored; c) any inspections or tests conducted under 310 CMR 7.24(1)(d)4. through 7.; d) any transfers made; and e) any maintenance of the vapor processing system.
EU 2-8	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with DEP Approval #1-P-99-006 (6/3/99), maintain a record of petroleum product throughput no less frequently than on a calendar month basis for the purpose of demonstrating compliance with the monthly throughput limits and the monthly/annual emission limits. These records (or a copy of the records) shall be supplied to the MassDEP upon request.
Facility-Wide	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain records of all monitoring data and supporting information on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application. 2) In accordance with 310 CMR 7.12, maintain the records required to determine the nature and amounts of emissions from the facility.

Table 6	
Emission Unit	Reporting Requirements ⁽¹⁾
EU 1	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with 40 CFR Part 64 and the facility's Compliance Assurance Monitoring Plan dated 6/3/2000, report semiannually the instances of alarms and any instances where an alarm did not lead to an immediate shutdown of the loading rack, in accordance with the schedule specified in "Table 6, Facility Wide, provision 2". 2) In accordance with 40 CFR Part 64 and the facility's Compliance Assurance Monitoring Plan dated 6/3/2000, submit the independent service contractor's report to the MassDEP prior to May 1st of each calendar year.
EU 2-7	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with Regulation 310 CMR 7.24(4)(g), copies of all records and reports required under 310 CMR 7.24 shall immediately be made available to the MassDEP upon verbal or written request, at any reasonable time.
Facility-Wide	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with 310 CMR 7.12(7), submit a Source Registration/Emission Statement form to the MassDEP on an annual basis. 2) In accordance with 310 CMR 7.00 Appendix C(10)(c), submit to the MassDEP two summaries (one by January 30 for the time period July – December of the previous calendar year, and the other by July 30 for the time period January – June of the current calendar year) of all monitoring data and related supporting information. 3) In accordance with 310 CMR 7.13(1)(d), submit to the MassDEP any stack test results for any air contaminant obtained from stack testing required by the MassDEP within such time as agreed to in the approved test protocol. 4) In accordance with 310 CMR 7.00 Appendix C(5)(b)9., submit annually a certification that the facility is maintaining the required records to assure the facility is in compliance with the applicable requirements designated in this permit. (See Provision 10 in "GENERAL CONDITIONS FOR OPERATING PERMIT") 5) In accordance with 310 CMR 7.00 Appendix C(10)(a), submit to the MassDEP any record relevant to this operating permit or to the emissions of any air contaminant from the facility within 30 days of the request by the MassDEP or EPA. 6) In accordance with 310 CMR 7.00 Appendix C(10)(f), shall report to the MassDEP's Regional Bureau of Waste Prevention all instances of deviations from permit requirements, by telephone or fax, within 3 days of discovery of such deviation. This report shall include the deviation itself, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. <p>aid permit deviation shall also be submitted in writing to the Regional Bureau of Waste Prevention within seven (7) days of documentation of the deviation by facility personnel. Deviations are instances where any permit condition is violated and has not already been reported as an emergency pursuant to section 24 of this permit.</p>

(1) The annual Source Registration/Emission Statement report shall be submitted to the DEP office specified in the instructions. **All other reports, including both 6-month summary reports, are to be submitted to the Western Regional Office address.**

- C. GENERAL APPLICABLE REQUIREMENTS – The Permittee shall comply with all general 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
42 U. S. C. 7401 § 112: Hazardous Air Pollutants	Not applicable; facility does not have potential to emit HAP above thresholds
42 U. S. C. 7401 § 112(r): Prevention of Accidental Releases	Not applicable; facility does not store, use, or process any of the listed compounds in quantities greater than thresholds.
40 CFR Part 82: Stratospheric Ozone	Not applicable
310 CMR 7.16: Reduction of Single Occupant Commuter Vehicle Use	Not applicable; facility employs fewer than 250 people.

5. Special Terms and Conditions

Table 8a	
Emission Unit	Special Terms And Conditions
EU 1	<p>ExxonMobil-Springfield shall</p> <ol style="list-style-type: none"> 1) In accordance with Regulation 310 CMR 7.24(2)(a)1., 2., and 4.- 6., and 40 CFR 60.502(f), ExxonMobil shall not cause, suffer, allow or permit the transfer of gasoline into a tank truck, trailer or other contrivance unless: <ol style="list-style-type: none"> 1. each loading rack at the bulk terminal is equipped with a vapor collection and disposal system, which has been installed and is maintained and operated in accordance with the operating instructions of the manufacturer; and, 2. any vapor discharged during transfer of the gasoline is collected and disposed of by the vapor collection and disposal system; and, 4. any transfer of gasoline takes place through a submerged fill pipe; and, 5. each loading rack is equipped with a loading arm which has a vapor collection adaptor designed, maintained and operated to force a vapor-tight seal between the adaptor and hatch; and, 6. each loading rack has a means to: <ol style="list-style-type: none"> a. prevent any remaining liquid gasoline from draining when the loading rack is disconnected from the hatch of any tank truck, trailer or other contrivances: or, b. accomplish complete drainage of any remaining gasoline before the loading rack is disconnected from the hatch of any tank truck, trailer or other contrivance; or, c. if loading is effected through means other than a hatch, then all loading and vapor lines shall be equipped with fittings which make vapor-tight connections and which close automatically when disconnected. 2) In accordance with 40 CFR 60.502(g), the owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

Table 8b

Emission Unit	Special Terms And Conditions
EU 1	<p>ExxonMobil-Springfield shall</p> <p>3) In accordance with 40 CFR 60.502(h), the vapor collection and liquid loading equip-ment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).</p> <p>4) In accordance with 40 CFR 60.502(i), no pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).</p>
EU 2-7	<p>ExxonMobil-Springfield shall</p> <p>1) In accordance with 310 CMR 7.24(1)(a), ExxonMobil shall not store, hold or otherwise transfer organic liquid in the storage tank unless each tank is equipped with a submerged fill pipe.</p> <p>2) In accordance with 310 CMR 7.24(1)(b)3., ExxonMobil shall not store, hold or otherwise transfer organic liquid in the storage tank unless each tank is equipped with a fixed roof and a floating roof consisting of a pontoon, double deck, or internal floating roof which rests on the surface of the liquid contents and is equipped with a closure seal, or seals, to close the space between the roof edge and tank wall, and tank gauging and sampling devices which are gas tight except when in use.</p> <p>3) In accordance with 310 CMR 7.24(1)(d)1. and 2., ExxonMobil shall not store, hold or otherwise transfer the organic liquid in the storage tank unless each of the seal(s) required by 310 CMR 7.24(1)(b)3. meet the following requirements, where applicable:</p> <ol style="list-style-type: none"> 1. there are no visible holes, tears, or other openings in the seal(s) or seal fabric; and, 2. the seal(s) is intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.
EU 2-7	<p>ExxonMobil-Springfield shall</p> <p>4) In accordance with 310 CMR 7.24(1)(e), ExxonMobil shall not store, hold or otherwise transfer the organic liquid in the storage tank unless all openings in a floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves, are:</p> <ol style="list-style-type: none"> 1. equipped with covers, seals, or lids which are kept closed except when the openings are in actual use; and, 2. equipped with projections into tank which remain below-the-liquid surface at all times. <p>5) In accordance with 310 CMR 7.24(1)(f) and (g), ExxonMobil shall not store, hold or otherwise transfer the organic liquid in the storage tank unless</p> <p>"(f) automatic bleeder vents are kept closed except when the roof is being floated off of, or being landed on, the roof leg supports; and,</p> <p>(g) rim vents are set to open when the roof is being floated off the leg supports, or at the manufacture recommended setting."</p>
Facility-Wide	<p>ExxonMobil-Springfield shall</p> <p>1) In accordance with 310 CMR 7.24(5)(a), no person shall sell or supply from a bulk terminal, gasoline having a Reid Vapor Pressure greater than 9.0 pounds per square inch (psi) during the period beginning May 1 and continuing through September 15 of any year.</p> <p>2) In accordance with Regulation 310 CMR 7.24(2)(e), any person who owns, leases, operates or controls a facility which is or becomes subject to 310 CMR 7.24(2)(a), (b) or (c), shall continue to comply with all requirement of 310 CMR 7.24(2)(a), (b) or (c), respectively, even if the facility no longer meets the applicability requirements of 310 CMR 7.24(2)(a), (b) or (c).</p>

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6. ALTERNATIVE OPERATING SCENARIOS

none

7. EMISSIONS TRADING

A. Intra-facility emission trading

The facility did not request intra-facility emissions trading in its operating permit application.

Pursuant to 310 CMR 7.00: Appendix C(7)(b), emission trades, provided for in this permit, may be implemented provided the Permittee notifies the United States Environmental Protection Agency (EPA) and the MassDEP at least fifteen days in advance of the proposed changes and the Permittee provides the information required in 310 CMR 7.00: Appendix C(7)(b)3.

Any intra-facility change that does not qualify pursuant to 310 CMR 7.00: Appendix C(7)(b)2. is required to be submitted to the MassDEP pursuant to 310 CMR 7.00: Appendix B.

B. Inter-facility emission trading

All increases in emissions due to emission trading must be authorized under the applicable requirements of 310 CMR 7.00: Appendix B (the "Emissions Trading Program") and the 42 U.S.C. §7401 et. seq. (the "Act"), and provided for in this permit.

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 MassDEP will submit an "Operating Permit Reporting Kit" to the Permittee which contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring summary Report and Certification.

(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 permit. The report shall be postmarked or delivered by January 30 to the MassDEP and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
- iv. 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 June 30 to the MassDEP. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;

- iv. whether there were any deviations during the reporting period;
- v. if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
- vi. whether deviations in the reporting period were previously reported;
- vii. if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
- viii. if the deviations in the reporting period have returned to compliance and date of such return to compliance; and
- ix. 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, Part D.
- C. Nothing in this permit shall alter or affect the following:
 - (i) the liability of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - (ii) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
 - (iii) 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, 7.02(8)(i), 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22 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 as per 310 CMR 7.00 Appendix C(3)(g)(12):

- 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.

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 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 based¹ emission limitations specified in this permit as a result of an emergency². In order to use emergency as an 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 Division of Hazardous Waste/Emergency Response and the Emergency Response Planning Council, 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 supercede the following deviation reporting requirements, if applicable.

The Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention the following deviations from permit requirements, by telephone or fax, within three (3) days of discovery of such deviation:

- Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence,

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

² An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

which are ten percent (10%) or more above the emission limit.

- Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the permit or approval as surrogate for an emission limit.
- Exceedances of permit operational limitations directly correlated to excess emissions.
- Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the Massachusetts Department of Environmental Protection Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is included with the Operating Permit. 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 or fax within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations which do not require 3 day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The Permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the permit and in compliance with all applicable requirements provided the Permittee gives the EPA and the MassDEP written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(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. LEGEND OF ABBREVIATED TERMS IN OPERATING PERMIT

Not all abbreviations are present in every Operating Permit

10⁶ Btu/hr – 1,000,000 Btu per hour

CEM – continuous emission monitor

CGA – cylinder gas audit

the Chart – the Ringelmann Scale for grading the density of smoke

CO – carbon monoxide

CO₂ – carbon dioxide

COM – continuous opacity monitor

DAS – data acquisition system

EPA – Environmental Protection Agency

FMF FAC. NO. – Facility Master File Number

FMF RO NO. – Facility Master File Regulated Object Number

ft³ – cubic feet

HHV – higher heating value

hr – hour

ISO – Represents 59°F, 60% Relative Humidity, 29.92 Inches Mercury At Sea Level

lb – pound

lb/MMBtu – pounds per million British thermal units

MMBtu/hr – million British thermal units per hour

MW – megawatt (1,000,000 watts)

ng – natural gas

NH₃ – ammonia

NO_x – nitrogen oxides

PLT ID – Plant Identification

PM – particulate matter

ppm – parts per million

ppmvd – parts per million (by volume, dry)

PTE – potential to emit

RATA – relative accuracy test audit

SO₂ – sulfur dioxide

SSEIS – Stationary Source Emission Inventory System

tpy – tons per year

VOC – volatile organic compound

APPEAL CONDITIONS FOR OPERATING PERMIT

This permit is an action of the MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C(6), with respect to the MassDEP's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the facility must continue to comply with all existing federal and state applicable requirements to which the facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the facility shall not be in violation of the Act for operating without a permit.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the permit is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to The Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

The Commonwealth of Massachusetts
Department of Environmental Protection
P. O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency) county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.