

# **JAMES HARDIE WESTFIELD NON-MAJOR COMPREHENSIVE PLAN APPROVAL (NMCPA) ENVIRONMENTAL JUSTICE FACT SHEET**

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## **Introduction**

James Hardie Building Products, Inc. (James Hardie) has filed an Air Quality Permit Application with the Massachusetts Department of Environmental Protection (MassDEP) for its proposed facility at 70 Industrial Turnpike Road in Westfield, Massachusetts. The proposed facility is subject to the Massachusetts Air Pollution Control Regulations (310 CMR 7.00) and must apply for and receive a permit (known as an "Approval") before it can begin construction of the project. The MassDEP is currently reviewing the permit application according to the applicable regulations. After completing its review, the MassDEP will issue a proposed decision to approve or deny the permit application, and at that time will provide a 30-day public comment period on its proposed decision. Information on how to review the permit application and be notified of the MassDEP's proposed decision, and how to submit comments, can be found at the bottom of this Fact Sheet.

## **Facility Information**

James Hardie recently purchased the former National Envelope Factory located at 70 Industrial Turnpike Road in Westfield, Massachusetts. Since the facility is new to James Hardie, there are not currently any air plan approvals associated with the site. James Hardie is proposing to turn the former factory into a painting facility using its ColorPlus technology.

The painting facility will consist of one ColorPlus line capable of producing 260,000,000 square feet per year of ColorPlus plank and panels. In addition to applying the various coatings, the rest of the facility will be used to warehouse products for shipment into the northeast regions.

## **Project Information**

James Hardie has applied for a Non-Major Comprehensive Plan Approval (NMCPA) for the installation of the new ColorPlus line at the Westfield Facility. The project is also subject to review under the Massachusetts Environmental Policy Act (MEPA) and has completed the MEPA Consultation process.<sup>1</sup>

The substrate to be coated on the new ColorPlus line, Hardie Plank and Panels, will be made at one or more of James Hardie's ten United States manufacturing facilities. Most of the substrate will be made in the new Prattville, Alabama plant and will be transported to Westfield via railcar. Once the railcars are received, the substrate will be offloaded and stored inside the manufacturing building.

The first step on the line will be to apply a base coat (sealer). The sealer does not contain any volatile organic compounds (VOCs) or hazardous air pollutants (HAPs). Once the sealer is applied, the substrate will be dried in a natural gas-fired oven. The combustion emissions from the natural gas-fired oven consists of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter (PM) and VOCs as well as small amounts of sulfur dioxide (SO<sub>2</sub>) and hazardous air pollutants (HAPs).

Once the sealer is dried, the substrate will enter the coating process. The first coating application will be performed inside a spray booth where the edges and the ends are coated. The spray booth will utilize non-air assisted spray nozzles and will contain a series of PM filters before the air is exhausted. The next coating application will be applied using roll coaters that apply the first topcoat to the board. From the roll coaters, the substrate will pass through the third and final coating application, the curtain coater. The coatings applied in the spray, roll, and curtain coating operations contain VOCs and inorganic HAPs. After all the coating

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<sup>1</sup> ENF Certificate issued November 8, 2021 (EEA #16451).

applications are completed, the substrate will pass through a natural gas cure oven to be dried. All of the VOCs and from the coating operations and the combustion emissions from the cure oven will be routed to a regenerative thermal oxidizer (RTO) with a VOC destruction efficiency of 98.5 percent. Particulates are produced as a result of overspray and are controlled by filters with a control efficiency of 99 percent.

Once the coated planks and/or panels are dried, they will be inspected for defects, laminated, and placed onto pallets. The pallets will then be bagged, labeled, and sent to the warehouse for storage and/or shipping.

In addition, a 300 kilowatt (kW) natural gas-fired emergency generator will be installed as a part of the project. The generator will be permitted under the MassDEP’s Environmental Results Program (ERP) per 310 CMR 7.26(42), so is not included in the NMCPA application.

## Emissions Summary

Table 1 includes the estimated proposed permitted emissions associated with the project.

**Table 1. Proposed Emissions Summary**

<b>Emission Source</b>	<b>PM<sub>10</sub>/PM<sub>2.5</sub> (tpy)</b>	<b>SO<sub>2</sub> (tpy)</b>	<b>NO<sub>2</sub>/NO<sub>x</sub> (tpy)</b>	<b>VOC (tpy)</b>	<b>CO (tpy)</b>	<b>Single HAP (tpy)</b>	<b>Combined HAP (tpy)</b>
Coating Operations	0.20	--	--	0.84	--	0.01	0.02
Natural Gas Combustion (Ovens)	1.21	0.10	15.15	0.87	10.78	0.01	0.01
Natural Gas Combustion (RTO)	0.05	0.02	4.22	0.17	2.53	2.26E-3	2.43E-3
Ink Printing	0.08	--	--	0.01	--	--	--
Onloader	1.63E-4	--	--	--	--	--	--
<b>Totals</b>	<b>1.54</b>	<b>0.11</b>	<b>19.37</b>	<b>1.89</b>	<b>13.31</b>	<b>0.01</b>	<b>0.03</b>

## Federal and State Regulatory Requirements

None of the emission units being proposed for the Westfield Facility are subject to any federal regulations under the National Emission Standards for Hazardous Air Pollutants (NESHAP) or New Source Performance Standards (NSPS), except for the new emergency generator. The emergency generator will be subject to 40 Code of Federal Regulations (CFR) Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and 40 CFR Part 63, Subpart ZZZZ – NESHAP for Reciprocating Internal Combustion Engines (NESHAP ZZZZ). The requirements under these two federal rules, include purchasing a certified engine and a 100 hour per year limitation on operation for testing and maintenance.

## Proposed Monitoring, Recordkeeping, and Reporting

In order to calculate emissions on a monthly basis, records of the following will be kept:

- ▶ Total amount of coating used
- ▶ VOC content of each coating
- ▶ Natural gas usage

The parameter to be monitored for the proposed particulate filter for the onloader as well as the spray booth filter will be pressure drop across the filters. The pressure drop will be continuously monitored and recorded at least once per shift.

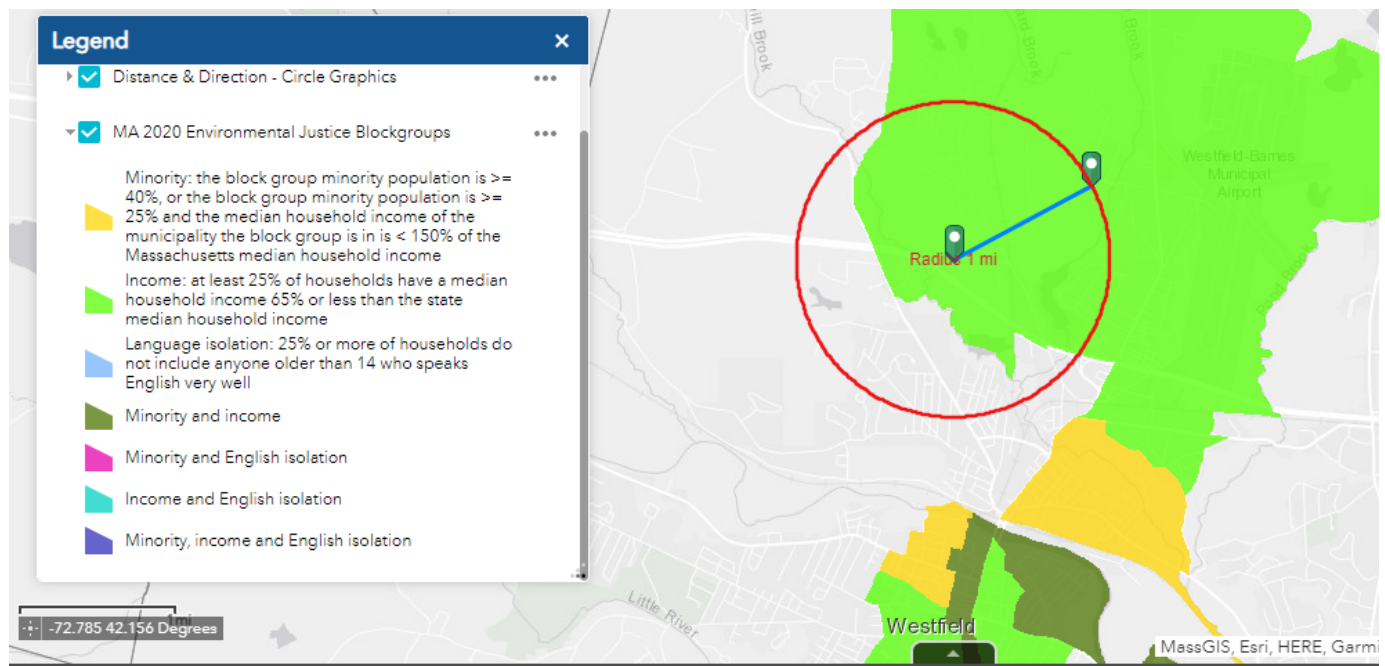
For the RTO, the temperature in the combustion chamber will be continuously monitored and recorded at least once every 15 minutes.

As noted in the regulatory requirements section, emissions reporting under the MassDEP's Source Registration regulations will be required.

## Environmental Justice Populations

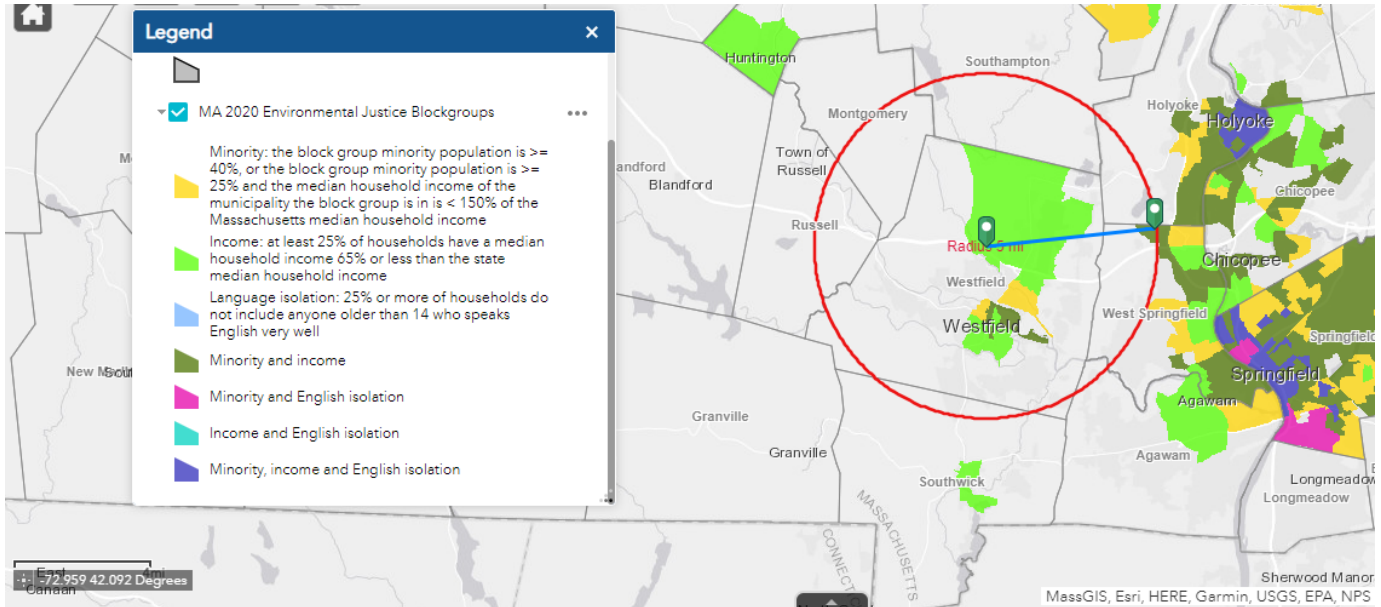
The Project Site is located within an Environmental Justice (EJ) population, specifically Block Group 3, Census Tract 8128, Hampden County, MA. The block group has been identified as an EJ population under the income criteria. The median household income for the block group was \$55,250, which is 64.4 percent of the Massachusetts median. The block group also contains a total minority population of 6.6 percent with a language isolation of 2.8 percent. A map of the EJ area within one mile of the facility is included in Figure 1. The EJ areas within five miles of the facility are included in Figure 2.

Figure 1. EJ Communities within 1 Mile



Data from <https://www.mass.gov/info-details/massgis-data-2020-us-census-environmental-justice-populations>

Figure 2. EJ Communities within 5 Miles



Data from <https://www.mass.gov/info-details/massgis-data-2020-us-census-environmental-justice-populations>

Community outreach has been conducted as a part of the MEPA process. A copy of the Environmental Notification Form (ENF) and the meeting notice for the Virtual MEPA Consultation was emailed to the following community groups:

- ▶ All Farmers  
Contact: Hannah Spare  
Email: [hannah@allfarmers.world](mailto:hannah@allfarmers.world)
- ▶ Alternatives for Community and Environment  
Contact: Dwaigh Tyndal  
Email: [dwaigh@ace-ej.org](mailto:dwaigh@ace-ej.org)
- ▶ Arise for Social Justice  
Contact: Tanisha Arena  
Email: [tanisha@arisespringfield.org](mailto:tanisha@arisespringfield.org)
- ▶ Neighbor to Neighbor Massachusetts  
Contact: Zulmalee Rivera  
Email: [zulma@n2nma.org](mailto:zulma@n2nma.org)
- ▶ Public Health Institute of Western Massachusetts  
Contact: Sarita Hudson  
Email: [shudson@publichealthwm.org](mailto:shudson@publichealthwm.org)

To date, James Hardie has not received any comments or feedback from any of the community groups.

James Hardie also presented information on the project to the Westfield Legislative and Ordinance Committee during a meeting on October 20, 2021.

## Public Participation and Comment

MassDEP is currently reviewing this permit application. If you have questions or would like more information about the permit application or agency review process or would like to be added to the distribution list to be notified when the public comment period on the draft decision begins, please contact the MassDEP personnel listed below.

The permit application is currently available for public review via the EEA ePLACE Public Access Portal:  
<https://eeaonline.eea.state.ma.us/EEA/PublicApp/>

On the main EEA ePLACE Portal page, click on the orange "Search and/or Comment" button, then on the name of the applicant/facility on the resulting page.

After MassDEP completes its review of the permit application, the agency will issue a proposed decision, subject to a 30-day public comment period. This information will also be posted in the ePLACE Public Access Portal. If you would like to be notified of the proposed decision and the public comment period, please contact [[MassDEP permit contact](#)].

### **Applicant Contact Information**

Questions regarding this project can be directed to:

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