



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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Commissioner

March 6, 2012

Kevin McNelis, President
Trelleborg Offshore Boston, Inc.
1902 Rankin Rd.
Houston, TX 77073

RE: **PLAN APPROVAL**
Application for: BWPAQ02
NON-MAJOR COMPREHENSIVE PLAN APPLICATION
Application No.: SE-11-033
Transmittal No.: X239255
Facility No.: 431079

AT: Trelleborg Offshore Boston, Inc.
290 Forbes Boulevard
Mansfield, Massachusetts

Dear Mr. McNelis:

The Department of Environmental Protection (“MassDEP”), Bureau of Waste Prevention, has reviewed Non-Major Comprehensive Plan Application (CPA) No. SE-11-033, received November 9, 2011, with supporting information received November 18, 2011. CPA No. SE-11-033 requests MassDEP approval to modify the pollution control equipment and install a paint spray booth at an existing facility at Trelleborg Offshore Boston, Inc., (hereinafter referred to as “Permittee” or “Trelleborg”), located at 290 Forbes Boulevard, Mansfield, Massachusetts.

The application was submitted in accordance with Section 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control Regulations,” adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, and Chapter 21C, Section 4 and 6.

MassDEP’s review has been limited to air pollution regulation compliance and does not relieve you of the obligation to comply with all other permitting requirements.

The application was prepared and submitted by Capaccio Environmental Engineering, Inc. over the seal and signature of Mr. David Cotter, Massachusetts Registered Professional Engineer No. 49068.

1. DESCRIPTION OF FACILITY and APPLICATION

Trelleborg has asked to remove the regenerative thermal oxidizer (RTO) from service that was installed in accordance with MassDEP Conditional Approval No. 4P06028 dated October 5, 2007. The RTO was required as Best Available Control Technology (BACT) based, in part, on VOC emissions initially determined to be emitted from AMG TG production. Trelleborg re-evaluated the emissions from AMG TG production and found that most of the VOCs contained in the raw material are retained in the final product and not emitted to the atmosphere. The revised emissions were confirmed by the RTO compliance testing conducted on February 10, 2011. Based on the revised VOC emissions, BACT has been determined to be operation of AMG TG production with no control. This Plan Approval grants Trelleborg's request to remove the RTO from service.

Emissions from the facility include Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs).

Facility operations are as follows:

- Expanded Polystyrene Ball Production – Styrene is expanded into balls in a steam heated expander (first cycle), the balls are passed through the expander a second time (second cycle), after which the balls are powder coated in a tumbler. The tumbler is vented to a Donaldson Torit Model 2DF4 baghouse. This dust collector also collects exhaust from the saw room. Total particulate emissions from the shared dust collector are less than one ton per year. Therefore, in accordance with 310 CMR 7.02(2)7, “De minimis Increase in Emissions,” particulate emissions are exempt from plan approval.
- TG Block Production – PMS or TBS is premixed prior to blending with micro-balloons. The blended mixture is poured into molds. Some of the blended mixture is sent directly to ovens for curing, while certain products are sent to a vacuum chamber for removal of entrained air prior to curing. After curing, the molds are sent to the cutting room. The cut product is placed in a post cure oven.
- Syntac/Eccolite Block – Polypropylene or CBT-100 resin is mixed, poured into molds than placed in a curing oven. The cured product is sent to the saw room.
- Extruded Polypropylene Tape – Product is heated, extruded, than cooled in a water bath.
- Process Cleaning – IPA and other cleaners are used to clean molds and equipment.
- Tooling Board Production – Product is mixed, poured into molds, put into a vacuum tank then cured. The cured boards are sent to a CNC machine, which is vented to an internally exhausted dust collector.
- EL/DS Block – Similar to Syntac/ Eccolite, except after sawing, the product is placed in a post cure oven. No VOC or HAP emissions are associated with this operation.

- Saw Room – Cured blocks from EL/DS, Syntac/Eccolite, and TG are cut into blocks. Exhaust from the saw room is vented to a dust collector, which is shared with the Expanded Styrene Ball tumbler.
- Paint Spray Booth – The paint spray booth will be installed and operated consistent with MassDEP Regulation 310CMR 7.03(16) “Paint Spray Booths,” except the VOC content of the paints, which are as established herein.

MassDEP is of the opinion that the submitted application is in conformance with current air pollution control engineering practices and hereby grants Plan Approval of CPA No. SE-11-033, subject to the following descriptions, requirements, and provisions:

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
1	Expanded Polystyrene Balls	110 pounds per batch 30 batches per week	Donaldson Torit Model 2DF4 baghouse
2	TG Production	143 blocks per day 0.5 ft ³ per block	None
3	Eccolite Production	30 ft ³ per week	None
4	Extruded Tape Production	950 pounds per hour	None
5	Cleaning Operations	Undetermined	None
6	Tooling Board	180 boards per week	Internally vented dust collector
7	Syntac / EL / DS	Undetermined	None
8	Saw Room	196 blocks per day	Donaldson Torit Model 2DF4 baghouse
9	Paint Booth	Undetermined	Paper particulate filters
10	Paint Booth Cleaning	Undetermined	None

Table 1 Key:

EU# = Emission Unit Number

Ft³ = cubic feet

3. OPERATIONAL, PRODUCTION and EMISSION LIMITS

A. The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2, below:

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
1	7.2 tons styropor per month 85.8 tons styropor per year	VOC	≤ 8.5% VOC 0.6 TPM 7.3 TPY
		HAPs (max single, total)	≤ 0.5% HAPs 0.04 TPM 0.4 TPY
2	Emissions based on 8,760 hrs of operation per year	VOC	≤ 2E-04 lb/ft ³ 0.01 TPY
3	Emissions based on 8,760 hrs of operation per year	VOC	≤ 0.034 lb VOC/ ft ³ 0.03 TPY
4	347 tons tape per month 4,160 tons tape per year	VOC	≤ 0.246 lb VOC/ ton tape 0.04 TPM 0.5 TPY
		HAPs (max single, total)	≤ 0.067 lb HAP / ton tape 0.01 TPM 0.1 TPY
5	30 gal solvent / month 150 gal solvent / year	VOC	≤ 6.56 lb VOC / gal 0.1 TPM 0.5 TPY
6	720 boards per month 9,360 boards per year	VOC	≤ 0.22 lbs VOC / board 0.1 TPM 1.0 TPY
		HAPs (max single, total)	≤ 0.11 lbs HAPs / board 0.04 TPM 0.5 TPY
7	None	None	None
8	None	None	None
9	200 gal / month 1,000 gal / year These limits are the combined total for paint and primer.	VOC	Primer ≤ 5.98 lb VOC/gal solids Paint ≤ 13.90 lb VOC/gal solids 0.5 TPM 2.4 TPY
		HAPs (max single, total)	Primer ≤ 5.98 lb HAPs/gal solids Paint ≤ 13.90 lb HAPs/gal solids 0.5 TPM 2.4 TPY

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
10	40 gal / month 200 gal / year paint booth installed and operated consistent with 310CMR 7.03(16)	VOC	7.81 lb VOC / gal 0.2 TPM 0.8 TPY
All	None	Opacity	0 %
Facility-wide limits		VOC	12.54 TPY
		HAPs (max single, total)	3.4 TPY

Table 2 Key:

- EU# = Emission Unit Number
- lb = pounds
- gal = gallons
- ≤ = less than or equal to
- VOC = Volatile Organic Compounds
- HAPs = Hazardous Air Pollutants
- TPM = tons per month
- TPY = tons per year based on a consecutive 12-month period

- B. The Permittee shall operate and maintain compliance with all applicable requirements contained in 310 CMR 7.18 “Volatile and Halogenated Organic Compounds.”
- C. The Permittee shall store and dispose of materials containing VOCs and HAPs in a manner that will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover. Proper disposal shall be in a manner consistent with all applicable regulations.

4. NOTIFICATIONS and REPORTING

- A. All notifications and reporting required by this Plan Approval shall be made to the attention of:

Department of Environmental Protection
Bureau of Waste Prevention
20 Riverside Drive
Lakeville, Massachusetts 02347
Attn: Section Chief,
Compliance and Enforcement Section
Telephone: (508) 946-2878
Fax: (508) 947-6557
(508) 946-2865

- B. MassDEP's Compliance/Enforcement Chief for the Bureau of Waste Prevention at this Office must be notified by telephone, or fax as soon as possible after the occurrence of any upsets or malfunctions to the facility equipment, air pollution control equipment, or monitoring equipment that result in an excess emission to the air and/or a condition of air pollution.

5. MONITORING and RECORDKEEPING REQUIREMENTS

- A. The Permittee shall maintain detailed emission records on a monthly basis and on a consecutive 12-month period basis (the total from the latest month plus the sum for the eleven months preceding the latest month). These records, including any other "credible evidence," shall document the compliance status of the facility regarding the conditions, provisions, requirements, and limits contained in this Plan Approval.
- B. Records documenting compliance with the provisions of this Plan Approval shall include, but not be limited to:
- 1) Identity, formulation (as determined by the manufacturer's formulation data) and quantity for each VOC and HAP containing material used.
 - 2) Total VOC and HAP content of each material cited in Table 1, above.

- C. The Permittee shall maintain monthly and annual logs of raw materials used. These logs shall be kept in a complete and accurate fashion at all times and shall be available for MassDEP inspections. The Permittee may reconcile VOCs and HAPs contained in any hazardous waste shipped during the month when determining monthly emissions. The Permittee shall maintain beginning and end of year inventory records, hazardous waste disposal records, and purchase records for VOC and HAP containing material, such that MassDEP may check these for consistency with plant logs. Such records shall verify the VOC and HAP content, and quantity present, in the waste shipped if reconciling monthly emissions.
- D. A copy of these records shall be kept readily available on site for a period of five (5) years and shall be made available to MassDEP and/or US EPA personnel upon request.

6. SPECIAL CONDITIONS

- A. Plan Approval SE-11-033 establishes authorization for Trelleborg to operate the equipment described herein. The facility and equipment shall be operated in strict accordance with this Plan Approval.
- B. This Plan Approval supersedes the following approvals in their entirety:
 - Interim Air Quality Plan Approval 4P06028, dated January 30, 2007.
 - Conditional Approval 4P06028 dated October 5, 2007.The above listed approvals shall be deemed null and void.
- C. The facility approved herein shall be operated in accordance with all limits and/or restrictions (i.e., operational limitations, emission limitations, etc.) contained in this Plan Approval. In addition, the facility shall be operated in strict accordance with the conditions, provisions, and / or descriptions contained in this Plan Approval, which include, but are not limited to: standard operating and maintenance procedures, preventative / mitigation measures for air pollution, recordkeeping, reporting, notifications, testing requirements etc.

7. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal should be required as a result of the approved construction, reconstruction, or alteration of this facility, the Permittee shall ensure that all

removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00. If construction or demolition which is subject to 310 CMR 7.09(2) should also be required, then the Permittee shall comply with the notification requirement contained therein.

- C. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- D. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- E. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- F. Failure by the Permittee to comply with any of the above stated conditions will constitute a violation of the 310 CMR 7.00 et seq, and subject the Permittee to enforcement action as provided by law.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. All Plan Approvals issued under 310 CMR 7.02 prior to the date of this Plan Approval shall remain in effect unless specifically changed by this Plan Approval. The Permittee shall not exceed the emission limits and comply with approved conditions specified in the applicable Plan Approval(s) unless specifically altered by this Plan Approval.
- K. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- L. The Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and Regulation 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions” that allow the Secretary to require the filing of an ENF and / or an Environmental Impact Report at a later time.

The enforceable conditions contained herein establish the federally enforceable status of this **PLAN APPROVAL**. MassDEP reserves the right to require changes in the standard operating and/or maintenance procedure, record keeping system, and to require additional process monitoring if it is determined necessary by MassDEP to ensure continuous compliance with the Air Quality Control Regulations contained in 310 CMR 7.00.

This Approval is an action of MassDEP; you have a limited right to appeal. Please refer to the enclosed “APPEAL” information, Attachment 1.

Enclosed is one stamped, approved copy of the application submittal.

Should you have any questions pertaining to this PLAN APPROVAL, contact Thomas Cushing at the Regional Office at (508) 946-2824.

Very truly yours,

*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.*

John K. Winkler, Chief
Permit Section
Bureau of Waste Prevention

W/TC

Attachment 1: “Appeal of Approval”

ecc: Mansfield Board of Health
Mansfield Fire Department
Trelleborg Offshore, attn: T. Adenodi
V. Banushi
Capaccio Environmental Engineering, attn: D. Cotter
DEP/SERO, attn: L. Carlson
DEP/SERO, attn: L. Black
DEP/BWP/BC-Boston, attn: Y. Tian

ATTACHMENT 1

APPEAL OF APPROVAL

This Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Approval.

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

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

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.

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.