



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

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
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RICHARD K. SULLIVAN JR.
Secretary

KENNETH L. KIMMELL
Commissioner

August 13, 2012

Mr. Michael Kramer
Vice President, Golf Ball Mfg. & Ops.
Acushnet Company
P.O. Box 965
Fairhaven, MA 02719

RE: New Bedford
Transmittal No.: X251675
Application No.: SE-12-026
Class: SM80-7
FMF No.: 314531
AIR QUALITY PLAN APPROVAL

Dear Mr. Kramer:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Waste Prevention, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the proposed revision of Best Available Control Technology (BACT) and operation of your Regenerative Thermal Oxidizers (RTOs) at your golf ball manufacturing facility located at 215 Duchaine Blvd., New Bedford, Massachusetts (“Facility”).

This Application was submitted in accordance with 310 CMR 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, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

On June 29, 2011, MassDEP approved Acushnet Company Application No. 4P11018. Proviso H.4 required the Applicant to test the two (2) RTOs, and propose final minimum combustion chamber operating temperatures and maximum allowable flowrates to meet the operational limitations contained in the Approval. Table 3. of this Approval also established BACT for specific coating transfer efficiencies and Table 2. established VOC content requirements for each of the two coating types.

In the current Application, the Permittee proposes final RTO operating temperatures, final RTO flowrates, and an alternate combination of coating transfer efficiencies and VOC content to meet BACT. Process and facility-wide potential VOC emissions remain unchanged.

The Permittee has indicated that an injection mold release product approved in Approval No. 4P11018, has been reformulated by the manufacturer, and now contains a different combination of VOCs, Halogenated Organic Compounds (HOCs), and Hydrocarbons (HYCs). The Permittee proposes revised descriptive elements in Table 2 (BACT Limitations) to allow for a reformulated product without changing potential facility-wide emissions of VOCs, HOCs, and HYCs. The Permittee also requested previously approved processes contained in Table A of Approval No. 4P11018 receive Emission Unit Identification numbers.

2. EMISSION UNIT (EU) IDENTIFICATION

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

EU#	Description ¹	Design Capacity ¹	Pollution Control Device (PCDs)
1	Seven (7) spray booths configured for water based coatings. ⁴	See Approval No. 4P11018	none
2	Seven (7) spray booths configured for solvent based coatings. ⁴ All solvent based spray booths vent to existing RTO1 and RTO2. ³	See Approval No. 4P11018	Flowrate into RTO1 and RTO2: ≤ 15,500 scfm each ² Flowrate out of RTO1 and RTO2: ≤ 16,600 scfm each ² See MassDEP Approval No. 4P11018
3	Paint Mix Room (primer and topcoat)	See Approval No. 4P11018	none
4	Pad Printing / Hot Stamping	See Approval No. 4P11018	none
5	Casting Manufacturing Cells	See Approval No. 4P11018	none
6	Precision Auto Buffing	See Approval No. 4P11018	none
7	Core Mold Release Spray Booth	See Approval No. 4P11018	none
8	Paint Cleaning	See Approval No. 4P11018	none
9	Maintenance Parts Washers	See Approval No. 4P11018	none
10	Cleaning	See Approval No. 4P11018	none
11	Core Manufacturing Process	See Approval No. 4P11018	none

Table 1 Key:

EU# = Emission Unit Number
 PCD = Pollution Control Devices
 RTO = Regenerative Thermal Oxidizer
 scfm = standard cubic feet per minute
 n/a = not applicable

Footnotes:

1. No change from Approval 4P11018 description.
2. Established pursuant Proviso No. 18 of Approval No. 4P11018, and contained in Test Report dated April 30, 2012.
3. BACT for solvent-based coatings continues to be thermal destruction.
4. The Facility is limited to a combined number of paint spray booths (water and solvent based) of seven (7).

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

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

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit^{1,2}
2	1. Solvent Based <u>Primer</u> Product Formulation: VOC Content \leq 5.06 pounds per gallon, as applied. ⁴ 2. HVLP transfer efficiency for the Solvent Based Top Coat in the Solvent Based Primer System: \geq 6,000 ball coats/gallon. ⁵ 3. HVLP minimum transfer efficiency for coatings <u>other</u> than Solvent Based Top Coat in the Solvent Based Primer System: \geq 9,000 ball coats/gallon. ⁵ 4. <u>Existing</u> Solvent Based Coating raw material usage ³ : \leq 36,413 pounds per month. 5. <u>Existing</u> Solvent Based Coating raw material usage ³ : \leq 145.7 TPY. 6. RTO1 and RTO2 Set Point Temperature \geq 1580 °F. ^{6,7,8}	VOC	728 pounds per month (after control). 2.91 TPY (after control).
3	7. Paint Mix Room <u>existing</u> raw material usage ³ : \leq 37,505 pounds per month. 8. Paint Mix Room <u>existing</u> raw material usage ³ : \leq 150 TPY.	VOC	1092 pounds per month. 4.37 TPY.

Table 2 Key:

EU# = Emission Unit Number
 VOC = Volatile Organic Compounds
 TPM = tons per month²
 TPY = tons per consecutive 12-month period²
 HVLP = High Volume Low Pressure
 RTO = Regenerative Thermal Oxidizer
 °F = Degrees Fahrenheit

Footnotes:

1. No change from Approval No. 4P11018.
2. See Approval 4P11008, Proviso C.1 for definition of “year” and “month”.
3. Sum of all VOCs contained in coatings.
4. Revises Product Formulation BACT for Solvent Based Primer, as contained in Table 2, line 3 of Approval No. 4P11018.
5. Supplements HVLP Minimum Transfer Efficiency BACT Requirements, as contained in Table 3 of Approval No. 4P11018.
6. Established to maintain a minimum VOC control efficiency of 98% as demonstrated by compliance emissions testing required by Proviso 18 of Approval No. 4P11018, and contained in Test Report dated April 30, 2012.
7. Temperatures shall be measured by thermocouples located at the downstream ends of the combustion chambers.
8. Supersedes Table 4 of Approval No. 4P11018.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

Table 3	
EU#	Monitoring and Testing Requirements
Facility-wide	<ol style="list-style-type: none"> 1. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration. 2. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13

Table 3 Key:

EU# = Emission Unit Number

USEPA = United States Environmental Protection Agency

Table 4	
EU#	Record Keeping Requirements
Facility-wide	<ol style="list-style-type: none"> 1. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 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. The Permittee may use a record keeping system that contains the information equivalent to the electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report . 2. The Permittee shall maintain records of monitoring and testing as required by Table 3. 3. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) and PCD(s) approved herein on-site. 4. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.

Table 4	
EU#	Record Keeping Requirements
	5. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	6. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	7. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	8. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number
 PCD = Pollution Control Device
 SOMP = Standard Operating and Maintenance Procedure
 USEPA = United States Environmental Protection Agency

Table 5	
EU#	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval 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).
	2. The Permittee shall notify the Southeast Regional Office of MassDEP, BWP Compliance and Enforcement Chief by telephone (508) 946-2878, email, sero.air@state.ma.us or fax (508) 947-6557 as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Compliance and Enforcement Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall report annually or every three years to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.

Table 5	
EU#	Reporting Requirements
	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:

EU# = Emission Unit Number

4. SPECIAL TERMS AND CONDITIONS

- A. The Permittee is subject to and shall comply with the Special Terms and Conditions as contained in Table 6:

Table 6

EU#	Special Terms and Conditions																																										
5	<p>1. Table 2. of MassDEP Plan Approval No. 4P11018, dated June 29, 2011, is rescinded, and replaced with Table 2A. as specifically listed below:</p> <p style="text-align: center;"><u>Table 2A. – VOC/HYC BACT Limitations⁽¹⁾</u></p> <table border="1" data-bbox="302 569 1360 1115"> <thead> <tr> <th>Product Formulation</th> <th>Maximum VOC Content (lb/gal)</th> <th>Maximum VOC Content (lb per gallon solids applied)</th> </tr> </thead> <tbody> <tr> <td>Two Coat Water Based Primer</td> <td>0.64</td> <td>2.03</td> </tr> <tr> <td>Solvent Based Topcoat</td> <td>4.293</td> <td>N/A⁽²⁾</td> </tr> <tr> <td>Solvent Based Primer</td> <td>5.06</td> <td>N/A⁽²⁾</td> </tr> <tr> <td>Adhesion Promoter</td> <td>1.8</td> <td>N/A</td> </tr> <tr> <td>Core Mold Release</td> <td>0.0</td> <td>N/A</td> </tr> <tr> <td>Castable Elastomer Mold Release</td> <td>0.0</td> <td>N/A</td> </tr> <tr> <td>Injection Mold Release⁽³⁾</td> <td>10.11⁽⁴⁾</td> <td>N/A</td> </tr> <tr> <td>Mold Cleaner</td> <td>7.67</td> <td>N/A</td> </tr> <tr> <td>Castable Elastomer Remover</td> <td>8.76</td> <td>N/A</td> </tr> <tr> <td>Paint spray booth cleaners/ Miscellaneous Cleaning⁽⁵⁾</td> <td>6.8</td> <td>N/A</td> </tr> <tr> <td>Maintenance Parts Washers</td> <td>6.5</td> <td>N/A</td> </tr> <tr> <td>Pad Print Ink</td> <td>5.9</td> <td>55.54</td> </tr> <tr> <td>Ink Process Cleaners⁽⁶⁾</td> <td>7.9</td> <td>N/A</td> </tr> </tbody> </table> <p>1. All VOC & Solids Content BACT limitations identified in Table 2A. are on an “as applied” basis. 2. BACT for solvent-based coatings will be thermal destruction. 3. Also used on the autobuff machines. 4. Maximum HYC or VOC content. 5. MEK, IPA, and commercial cleaners such as Fantastik® and Windex® used throughout the facility for miscellaneous cleaning. 6. Includes inks thinners, cleaners, ink cup cleaners, ball washer cleaners</p>	Product Formulation	Maximum VOC Content (lb/gal)	Maximum VOC Content (lb per gallon solids applied)	Two Coat Water Based Primer	0.64	2.03	Solvent Based Topcoat	4.293	N/A ⁽²⁾	Solvent Based Primer	5.06	N/A ⁽²⁾	Adhesion Promoter	1.8	N/A	Core Mold Release	0.0	N/A	Castable Elastomer Mold Release	0.0	N/A	Injection Mold Release ⁽³⁾	10.11 ⁽⁴⁾	N/A	Mold Cleaner	7.67	N/A	Castable Elastomer Remover	8.76	N/A	Paint spray booth cleaners/ Miscellaneous Cleaning ⁽⁵⁾	6.8	N/A	Maintenance Parts Washers	6.5	N/A	Pad Print Ink	5.9	55.54	Ink Process Cleaners ⁽⁶⁾	7.9	N/A
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Facility-wide	<p>2. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.</p>																																										

Table 6 Key:

EU# = Emission Unit Number

B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.”

- C. The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
n/a	n/a	n/a	n/a	n/a

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

5. 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 will occur 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.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. 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.
- E. 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.

- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- 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. 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.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), 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.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & 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 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan 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 Plan Approval.

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 Plan Approval 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:

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

This 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.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Dan Kamieniecki by telephone at 508-946-2717, or in writing at the letterhead address.

*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.*

Thomas Cushing
Permit Section
Bureau of Waste Prevention

Enclosure

ecc: New Bedford Heath Department
New Bedford Fire Department
MassDEP/Boston – Y. Tian
Mass DEP/SERO – M. Pinaud, L. Black
Epsilon Associates, Inc – D. Raczynski
Acushnet Company – K. Kelly