



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

DEVAL L. PATRICK
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Commissioner

Mr. Tim Pybus
Gloucester Transit Mix, Inc.
P O Box 1328
Gloucester, MA 01930

Date Stamped December 20, 2011
RE: Final Approval of LPA for
Non-Fuel Emissions at
Gloucester Transit Mix
45 Emerson Avenue
Gloucester, MA 01930
Transmittal No. X235723
Application No. MBR-11-IND-002

Dear Mr. Pybus:

The Metropolitan Boston/Northeast Regional Office of the Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention has determined that the referenced Limited Plan Application ("LPA") is administratively complete and in conformance with current air pollution control engineering practices. MassDEP approves the referenced LPA authorizing the modification and operation of an existing ready mixed concrete batching plant identified as Unit No. 1at the Gloucester Transit Mix ("GTM") facility located at 45 Emerson Avenue, Gloucester, Massachusetts ("the Facility"). The modified Facility will utilize the existing silo, central dust collector, and water heater and will be equipped with a new material weight hopper and two (2) new silos. A technical deficiency letter was issued to GTM by MassDEP on March 4, 2011. The technical deficiency response was received on October 24, 2011.

This LPA Approval is in accordance with 310 CMR 7.02(1), (3) and (4) of the Air Pollution Control Regulations ("Regulations"), 310 CMR 7.00, as adopted pursuant to M. G. L. c. 111, Sections 142A-142K.

Included as part of the LPA Approval are the following:

Stamped approved **BWP AQ 01-B** Application form,
General Conditions for Non-Fuel Emission LPAs,
Special Conditions, and
Appeal Rights.

Please review the entire LPA Approval carefully as it stipulates the particular conditions to which the facility owner/operator must adhere for the facility to be constructed/reconstructed/alterd and operated in compliance with the Regulations.

MassDEP has determined that the filing of an Environmental Notification Form ("ENF") with the Secretary of Energy & Environmental Affairs, for air quality purposes, was not required prior to this action by the Department. Notwithstanding this determination, the Massachusetts Environmental Policy Act and Regulation 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 Environmental Impact Report at a later time.

Should you have any questions concerning this Approval, please contact Mr. Dhiraj Desai at (978) 694-3282.

Very truly yours,

Dhiraj B. Desai
Environmental Engineer
Bureau of Waste Prevention

James E. Belsky
Permit Chief
Bureau of Waste Prevention

cc: Board of Health, 3 Pond Road, City Hall Annex, Gloucester, MA 01930
Fire Department, 8 School Street, Gloucester, MA 01930
DEP/BWP, E-Copy, Attn: Yi Tian, M. Altobelli
DEP/NERO, M. Altobelli, M. Persky, D. Desai
Decoulos & Company, 185 Alewife Brook Pkwy, Cambridge, MA 02138, Attn: James Decoulos

Attachment: BWP AQ 01-B LPA



GENERAL CONDITIONS FOR NON-FUEL EMISSION LPAs

1. Operation - No person shall operate a facility constructed, substantially reconstructed, or altered pursuant to 310 CMR 7.02 except in conformance with the requirements established therein and in conformance with the specific written plan approval requirements.
2. Record keeping - The facility owner/operator shall establish and continue an on-site recording system. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination. Record keeping shall, at a minimum, include:
 - a) The initiation and completion dates for the proposed construction /reconstruction/ alteration.
 - b) Maintenance. A record of routine maintenance activities including, at a minimum, a description of the maintenance performed and the date and time the work was completed.
 - c) Malfunctions. A record of all malfunctions including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed and the facility returned to compliance.
 - d) Records shall be maintained documenting the air contaminant emission analysis supporting the response to BWP AQ 01-B Section-C.
 - e) All records shall be kept on site for five (5) years from date of record and shall be made available to the MassDEP upon request.
3. The Regional Bureau of Waste Prevention 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 which result in an excess emission to the air and a condition of air pollution.
4. The MassDEP must be notified in writing, when the subject equipment has been installed and has been deemed ready for continuous operation, within fourteen (14) days thereof.
5. The MassDEP may revoke, in accordance with 310 CMR 7.02(3)(k), any plan approval if the actual construction has not begun within two years from the date of issuance or if, during the construction, the construction is suspended for the period of one year or more.
6. Reporting - Any construction, substantial reconstruction or alteration, as described in 310 CMR 7.02(1), (3), and (4), at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to the MassDEP on the next required source registration.
7. This approval may be suspended, modified, or revoked by the MassDEP if, at any time, the MassDEP determines that the facility is violating any condition or part of this LPA Approval. The MassDEP shall be notified in writing prior to any modification of the facility such as a change in raw materials or an increase in production capacity, which may increase emissions.

8. Noise from the facility during construction, initial start-up and routine operation, including start-ups and shutdowns, shall not exceed the MassDEP noise guidelines and shall not cause a condition of air pollution as defined in 310 CMR 7.01 and 7.10.
9. The facility shall be constructed and operated in a manner to prevent the occurrence of dust or odor conditions, which may cause or contribute to a condition of air pollution as defined in 310 CMR 7.01 and 7.09.
10. Emission Testing – The MassDEP may, in accordance with Regulation 310 CMR 7.13, require source emission testing ("stack testing"). All emission testing shall be conducted in accordance with the MassDEP's Guideline for Source Emission Testing and with 310 CMR 7.13(a) - (d).
11. This Final Approval does not negate the responsibility of owner/ operator of the referenced facility to comply with this or any other applicable federal, state, or local regulations now or in the future.
12. Should asbestos remediation/removal be required as a result of the approved construction/reconstruction/or alteration of this facility, such asbestos remediation/removal shall be done in accordance with Regulation 310 CMR 7.15 in its entirety and 310 CMR 4.00.
13. Opacity, exclusive of uncombined water, shall not exceed 10% at all times during all modes of operation, including startups and shutdowns. Visible emissions or opacity, which exceeds the limits set forth in this approval, shall be reported to the MassDEP in writing or by Fax within seven (7) days of occurrence.
14. The facility shall be constructed and operated in strict accordance with the application approved herein. Should there be any difference between the aforementioned application and this approval letter, this approval letter shall govern.

SPECIAL CONDITIONS

1. The owner/operator of the Facility shall take immediate steps to abate any nuisance condition(s), including but not limited to visible emissions, noise, and odor, that may be generated by the operation of the subject facility.
2. The owner/operator of the Facility shall limit its hours of operation to between 6:00 AM to 5:00 PM only. Written documentation of the operating hours of the Facility shall be maintained on-site. These records shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request.
3. The owner/operator of the Facility shall limit Facility-wide particulate matter (PM) emissions to a total of no more than 1.0 ton per month and 9.9 tons per rolling 12-month period. The owner/operator of the Facility shall restrict concrete production to no more than 84,000 cubic yards per month and no more than 1,007,610 cubic yards per rolling 12-month period. The owner/operator of the Facility shall maintain adequate records to document actual monthly and rolling 12-month PM and PM10 emissions and concrete product manufactured. These records shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request.

4. The owner/operator of the Facility shall ensure that the subject concrete batching plant shall be equipped with a central dust collection system serving the truck loading operations and the cement silos, with a minimum overall particulate matter (PM) control efficiency of 99.9 percent by weight. Air used to pneumatically convey the new plant's cement powder and dust shall be exhausted through these filters. The concrete batch mix plant itself shall be enclosed within a building.
5. The owner/operator of the Facility shall install, operate and maintain pressure differential monitors with high pressure limits and low pressure limits set across the baghouse serving the subject concrete batch plant, including audible and visual alarms to signal the need for corrective action when an operating pressure differential between the inlet and outlet of the baghouse reaches the operating pressure differential as determined from optimization of differential pressure testing, in inches of water gauge or other conventional units of pressure.
6. The owner/operator of the Facility shall operate the subject concrete batch plant so that visible emissions from its baghouse shall be less than or equal to five (5) percent opacity, except for a period, or an aggregate period, of time not to exceed two (2) minutes during any one hour when visible emissions may have an opacity of up to ten (10) percent. At no time shall visible emissions from said plant exceed ten (10) percent opacity, exclusive of uncombined water vapor.
7. The owner/operator of the Facility shall install, operate and maintain a "fail-safe" electronic interlock system for the baghouse serving the subject equipment so as to prevent the subject concrete batching plant from operating if the air pollution control system is not working. The owner/operator of the Facility shall keep records of the cause of any process shut down, any repairs and preventive measures performed to correct the cause(s) of the shutdown and the duration of any process shut down. These records shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request.
8. The owner/operator of the Facility shall conduct a visolite test or equivalent on the baghouse at least once every six (6) months to locate leaks, bag failures, or problems with the operation of the baghouse, such as excessive opacity. Visolite test records shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request.
9. Within ninety (90) days of the date of completion of installation and testing of pressure differential monitors and fail safe electronic interlock system for the baghouse, the owner/operator of the Facility shall submit to MassDEP, for approval, the updated SOMP for the Facility, which includes but is not limited to, the operating parameters established during the optimization of pressure differential, start-up and maintenance procedures of its baghouse, emergency measures to be taken should the baghouse malfunction, and all record keeping requirements for the subject air pollution control system. The owner/operator of the Facility shall operate it in accordance with its approved SOMP. Future updates to the SOMP shall be submitted to MassDEP within thirty (30) days of said revisions. MassDEP must approve of significant changes to the SOMP prior to the change becoming effective. The updated SOMP shall supersede prior versions of the SOMP. Maintenance records for all air pollution control systems shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request.

10. The owner/operator of the Facility shall employ the following controls, procedures, and practices to minimize fugitive dust emissions:
 - a. A mechanical street sweeper shall be used to clean the paved portions of the plant area as conditions warrant.
 - b. Truck charging stations below the dry batch station shall be periodically cleaned of any spillage which may occur to help prevent trucks from transferring any dusty materials to adjacent areas.
 - c. The aggregate bins shall be enclosed and all aggregate shall be pre-washed with a moisture content of approximately 4 percent prior to delivery to the Facility.
 - d. If a nuisance condition caused by the wind erosion of fines from the stockpiles of raw aggregates occurs, the owner/operator of the Facility shall take whatever measures are feasible to minimize the problem.
11. The owner/operator of the Facility shall ensure that the subject hot water heater shall be restricted to a maximum usage of 3,120 gallons of ultra low sulfur diesel (ULSD), having a maximum sulfur content of 0.0015 percent by weight, per month and 9,360 gallons of ULSD per rolling 12-month period.
12. The owner/operator of the Facility shall ensure that the exhaust from each exhaust stack for the hot water heater shall exhaust vertically and shall not be impeded by any stack exit rain protection device.
13. The owner/operator of the Facility shall maintain an Environmental Logbook, or equivalent record keeping system, which shall record actions associated with environmental issues and overall emission changes at the facility. The owner/operator of the Facility shall record information such as the results of federal, state, or local environmental inspections; and measures taken to lower overall emissions to the environment. This logbook, or equivalent, shall be made available to MassDEP personnel upon request.
14. The owner/operator of the Facility shall ensure that a copy of this Approval letter shall be affixed adjacent to the subject equipment.
15. This Approval consists of the Application materials and this Approval letter. If conflicting information is found between these two documents, then the requirements of the Approval letter shall take precedence over the documentation in the Application materials.

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 which 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.