



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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May 15, 2012

Ralph DeLullo
Gulfstream Aerospace Services Corporation
33 Elise Street
Westfield, Massachusetts 01085

Re: Westfield
Transmittal No.: X241129
Application No.: 1-P-12-002
Class: SUBMIN
FMF No.: 339641
AIR QUALITY PLAN APPROVAL

Dear Mr. DeLullo:

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 modification of an existing paint spraying operation to increase the allowable volatile organic compounds (“VOC”) and hazardous air pollutant (“HAP”) emissions as well as to include the operation of an existing surface preparation, repainting, facility-wide cleanup and adhesive application operation at your Gulfstream Aerospace Services Corporation facility located at 33 Elise Street in Westfield, Massachusetts 01805.

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

The MassDEP received, on January 10, 2012, an administratively complete Application for the modification of an existing paint spraying operation to increase the allowable VOC and HAP emissions due to an increase in the quantity of aircrafts serviced at the Gulfstream Aerospace Services Corporation (“Gulfstream”) located in Westfield. The Application was subsequently modified to include an existing surface preparation, facility-wide cleanup, depainting and adhesive application operation.

Gulfstream operates a small aircraft upgrading and refurbishing operation in their aircraft service hangars. The paint spraying operation consists of a walk-in paint spray booth, four open face adhesive/paint spray bays, a temporary mobile ventilated enclosure, cleanup of work surfaces and tools and the use of a fully enclosed gun cleaning device. Other operations associated with the paint spraying operation are surface preparation and depainting (chemical and non-chemical paint stripping) of airplane components. The facility also has an existing adhesive application operation and uses solvents for facility-wide cleanup operations.

Paint Spray Operation

The paint spray booth and four paint spray bays are used for the purposes of surface coating aircraft parts, fixtures, appliances and furniture for use in the aerospace industry. Metal, composite, or wood substrates are coated in the spray booth. The four bays generally coat metal or composite airplane components along with decorative components consisting of wood and/or metal of the aircraft interiors. The bays are mainly used for some paint spraying, adhesive spraying and mechanical or hand sanding. The bays can be used separately or as one unit to spray large parts. The paint spray booth and bays are each equipped with Paint Arrestors-Series 3300, high efficiency, envelope design, polyester filters with an average particulate matter removal efficiency of 99.84% and each booth/bay has a dedicated exhaust stack. The pressure drop across the filters are continuously monitored using a magnehelic gauge and are recorded once per shift.

In addition to the paint spray booth and bays, there are occasions where a temporary mobile ventilated enclosure is used to perform touch up spray operations on sections of fuselage that are too large for the booth or bays. Gulfstream has termed the mobile enclosure a “tent and vent system”. Prior to paint spraying these large sections, a tent and vent enclosure system is constructed over the affected area using a fabric made of high-density polyethylene fibers. The enclosure is equipped with a 3-stage system custom filter box to capture overspray and dust particulate matter which is exhausted indoors or outdoors. The 3-stage custom filter box has a particulate matter control efficiency of 99.99% according to the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992”. A magnehelic gauge measures the pressure drop across the filter box. Air flow is provided by an Allegro Venturi style pneumatic air blower.

High volume low pressure (HVLV) spray guns are used to apply the coatings and they are cleaned using an existing fully enclosed gun cleaning device at the facility. The enclosed gun cleaner uses an acetone-based and/or a solvent-based solution. The booth is equipped with a natural gas direct-fired burner with a maximum heat input capacity of 0.972 million Btu per hour

for use in the coating operation. Gulfstream has identified the booth and bays as Emission Unit #1 through #5.

The highest VOC content paint and/or primer that will be used in the surface coating operation is 6.5 pounds per gallon as applied according to the material safety data sheet (MSDS). The highest HAP content paint and/or primer will be 3.86 pounds per gallon as applied. The HAP content was calculated from the MSDS information. Based on an average VOC content coating of 5.43 pounds per gallon, the highest HAP content coating and a maximum usage of 3,205 gallons per year of paints, primers and additives, including thinners, the surface coating operation will not exceed 8.7 tons per year of VOCs and 6.18 tons per year of HAPs. The particulate matter emissions, which include particulate matter having a diameter of 10 microns or less (PM10) and particulate matter having a diameter of 2.5 microns or less (PM2.5), will not exceed 0.011 tons per year from the surface coating operation.

Surface Preparation and Facility-Wide Cleanup Operations

Surface preparation is used to clean the surface of any contaminants such as tar, grease or wax prior to surface coating. Surface preparation is conducted in the paint spray booth or in one of the bays or in one of the service hangars when working on large aircraft parts that cannot be removed from the aircraft, such as fuselage, wings and tails. The surface preparation materials are applied by hand with a brush and/or a cloth. Materials used for surface preparation may contain VOC and/or HAPs.

The facility also performs cleanup operations which include cleanup from the work surfaces and tools used in the paint spraying operation, as well as cleanup related to other aircraft service or maintenance activities conducted throughout the facility. The cleanup operations are conducted in the same areas as surface preparation. Materials used for cleanup operations may contain VOCs and/or HAPs. The materials used for cleanup are applied manually by hand with a brush and/or a cloth or by other means which minimizes VOC and/or HAP emissions.

Gulfstream has proposed that the maximum emissions from the surface preparation and facility-wide cleanup operations will not exceed 3.6 tons per year of VOCs and HAPs based on a maximum VOC/HAP content of 7.3 pounds per gallon. Based on this information, a maximum of 990 gallons per year of surface preparation and cleanup materials will be used at the facility.

Depainting

Depainting, also called paint stripping, consists of the removal of a permanent coating from the outer surface by chemical or non-chemical means. Depainting is conducted in the paint spray booth or in one of the bays or in one of the service hangars when working on large aircraft parts that cannot be removed from the aircraft, such as fuselage, wings and tails. Depainting is generally performed by non-chemical methods by using a HEPA vacuum assisted hand sander. If chemical paint stripping is performed, non-methylene chloride based paint strippers are used as much as possible. The chemical paint strippers are applied by hand with a brush and/or a cloth. The non-methylene chloride paint stripper has a maximum VOC content of 5.67 pounds per gallon and no HAPs. However, if methylene chloride is needed, the facility will use no more than 20 gallons per year of methylene chloride-containing material.

Gulfstream has stated that the air contaminant emissions from depainting will not exceed 0.333 tons of VOCs per year and 0.333 tons of HAPs per year. Based on the above information, a maximum of 117.5 gallons per year of non-methylene chloride-containing depainting materials will be used in this area.

Adhesive Application

The adhesive application operation consist of applying adhesives to various substrates including fabric, foam, composites, wood and/or metal, mostly included in aircraft for decorative purposes. The application of adhesives is performed in the paint spray booth or in one of the bays. The adhesives are applied using caulking-type guns, aerosol spray cans, paint-brushes and/or spray guns. The highest VOC and HAP content adhesive is the Mohawk Finishing's Cyanoacrylate Adhesive which contains 8.32 pounds per gallon of VOCs and 7.884 pounds per gallon of HAPs. Based on the adhesive VOC and HAP content and a maximum usage of 418.27 gallons per year, the adhesive application operation will not exceed 1.74 tons per year of VOCs and 1.65 tons per year of HAPs

Facility-Wide Emission Rates

Gulfstream has requested to establish a facility-wide emission limit of 8.7 tons of VOCs in any 12 consecutive month period and 6.18 tons of total HAPs in any 12 consecutive month period.

Regulatory Applicability

The paint spray operation (including the enclosed spray gun cleaner) and the associated surface preparation, facility-wide cleanup, depainting, and the adhesive application operation are subject to the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. In lieu of a top-down BACT analysis, 310 CMR 7.02(8)(a)2.b. allows for the proposal of an emission control limitation using a combination of best management practices, pollution prevention and a limitation on the hours of operation and /or raw material usage which is only available if the proposed allowable emissions are less than 18 tons of VOCs per 12 consecutive month period, less than 18 tons of total organic material HAP and less than ten tons of a single organic material HAP. The use of low VOC and HAP coatings are not technically feasible since the coatings must conform to military or other engineering specifications. However, Gulfstream will minimize VOC and HAP emissions from their operations by limiting the VOC and HAP contents of coatings/materials, limiting the usage of VOC and HAP-containing coatings/materials and implementing work practices which minimize the evaporation of VOCs and HAPs.

In addition to being subject to the BACT requirements of 310 CMR 7.02(8)(a)2., the paint spray operation (including the enclosed spray gun cleaner) and the associated surface preparation, facility-wide cleanup, depainting, and adhesive application operation are subject to the visible emission requirements of 310 CMR 7.06, the dust, odor, construction and demolition requirements of 310 CMR 7.09 and the noise reduction requirements of 310 CMR 7.10.

The 0.972 million Btu per hour natural gas direct-fired burner is exempt from plan approval requirements pursuant to 310 CMR 7.02(2)(b)15.

This Approval will supercede Approval 1-P-00-037, issued October 16, 2000, in its entirety.

2. EMISSION UNIT (EU) IDENTIFICATION

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

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
1	Paint Spray Operation–Paint Spray Booth	N/A	Fabric Filter
2	Paint Spray Operation -Open Face Paint Spray Bay	N/A	Fabric Filter
3	Paint Spray Operation - Open Face Paint Spray Bay	N/A	Fabric Filter
4	Paint Spray Operation -Open Face Paint Spray Bay	N/A	Fabric Filter
5	Paint Spray Operation - Open Face Paint Spray Bay	N/A	Fabric Filter
6	Paint Spray Operation-Temporary Mobile Ventilated Enclosure	N/A	3-stage custom filter box
7	Enclosed Spray Gun Cleaner	N/A	N/A
8	Surface Preparation and Facility-Wide Cleanup Operations	N/A	N/A
9	Depainting	N/A	N/A
10	Adhesive Application	N/A	N/A

Table 1 Key:

EU# = Emission Unit Number
 PCD = Pollution Control Device
 N/A = Not Applicable

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, below:

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
1 2 3 4 5 6	1. No more than a combined total of 3,205 gallons of paints, primer and additives, including thinners, shall be used in the surface coating process in any 12 consecutive month period. 2. The paints and primers shall not exceed 6.5 pounds of VOCs per gallon of coating as applied. 3. The paints and primers shall not exceed 3.86 pounds of HAPs per gallon of coating as applied. 4. If a paint or primer requires the addition of a reducer, hardener, or other additive, in some combination, the manufacturer recommended amount(s) of reducer, hardener, or other additive added must not cause the coating, as applied to exceed the applicable VOC and HAP content limitation.	VOC/HAPs	1 ton of VOCs per calendar month and 8.7 tons of VOCs in any 12 consecutive month period 0.77 tons of HAPs per calendar month and 6.18 tons of HAPs in any 12 consecutive month period
	5. Visible emissions from the exhaust stack of each paint spray booth shall have 0% opacity.	Opacity	0%
8	6. No more than 990 gallons of surface preparation and cleanup materials shall be used in any 12 consecutive month period. 7. The surface preparation and cleanup materials shall not exceed 7.3 pounds of VOCs per gallon of material as applied and 7.3 pounds of HAPs per gallon of material as applied.	VOC/HAPs	0.6 tons of VOCs per calendar month and 3.6 tons of VOCs in any 12 consecutive month period 0.6 tons of HAPs per calendar month and 3.6 tons of HAPs in any 12 consecutive month period
9	8. No more than 20 gallons of methylene chloride-containing chemical strippers shall be used in any 12 consecutive month period. 9. No more than 117.5 gallons depainting materials shall be used in any 12 consecutive month period. 10. Depainting materials (which contain no methylene chloride) shall not exceed 5.67 pounds of VOCs per gallon of material as applied and no HAPs.	VOC/HAPs	0.06 tons of VOCs per calendar month and 0.333 tons of VOCs in any 12 consecutive month period 0.06 tons of HAPs per calendar month and 0.333 tons of HAPs in any 12 consecutive month period

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
10	11. No more than 418.27 gallons of adhesives shall be used in any 12 consecutive month period. 12. The adhesives shall not exceed 8.32 pounds of VOCs per gallon as applied and 7.884 pounds of HAPs per gallon as applied. 13. If an adhesive requires the addition of a reducer, hardener, or other additive, in some combination, the manufacturer recommended amount(s) of reducer, hardener, or other additive added must not cause the adhesive, as applied, to exceed the applicable VOC and HAP content	VOCs/HAPs	0.29 tons of VOCs per calendar month and 1.74 tons of VOCs in any 12 consecutive month period <hr/> 0.28 tons of HAPs per calendar month and 1.65 tons of HAPs in any 12 consecutive month period
Facility-wide		VOC	8.7 tons in any 12 consecutive month period
		Total HAPs	6.18 tons in any 12 consecutive month period

Table 2 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

Total HAPs= Total Hazardous Air Pollutants

B. COMPLIANCE DEMONSTRATION

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

Table 3	
EU#	Monitoring and Testing Requirements
1 2 3 4 5 6	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., EU #1,2,3,4,5 and 6 shall each be equipped with instrumentation to continuously monitor the pressure drop across the paint spray filters.
7	2. The permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.
Facility-wide	3. 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#	Recordkeeping Requirements
1 2 3 4 5 6	<p>1. The permittee shall maintain comprehensive and accurate records which shall contain:</p> <p>a. the amount of paints, primers, additives, and thinners used, in units of gallons, in the surface coating process during each month and in each 12 consecutive month period;</p> <p>b. the VOC and HAP content in units of pounds per gallon of each coating as applied in the surface coating process; and</p> <p>c. maintenance records of filter pad replacement and disposal.</p> <p>2. The permittee shall record the pressure drop across each of the paint spray filters associated with EU #1,2,3,4,5 and 6 once each shift during which coating operations occur and record the acceptable limit of pressure drop as specified by the filter or booth manufacturer.</p> <p>3. The permittee shall keep documentation of the particulate control efficiency of the filter material used in EU #1, 2,3,4,5 and 6.</p>
7	<p>4. The permittee shall keep a record of all enclosed spray gun cleaner inspections which shall include:</p> <p>a. date of the inspection;</p> <p>b. date leak was discovered; and</p> <p>c. date leak was repaired.</p>
8	<p>5. The permittee shall maintain comprehensive and accurate records for the surface preparation materials which shall include:</p> <p>a. The name of each surface preparation material;</p> <p>b. The VOC and HAP content in units of pounds per gallon for each surface preparation material; and</p> <p>c. The amount of each VOC and/or HAP-containing surface preparation material used, in units of gallons, during each month and in each 12 consecutive month period.</p> <p>6. The permittee shall maintain comprehensive and accurate records for the facility-wide cleanup operations which shall include:</p> <p>a. The name of each cleanup material;</p> <p>b. The VOC and HAP content in units of pounds per gallon for each cleanup material; and</p> <p>c. The amount of each VOC and/or HAP-containing cleanup material used, in units of gallons, during each month and in each 12 consecutive month period.</p>
9	<p>7. The permittee shall maintain comprehensive and accurate records for the depainting materials which shall include:</p> <p>a. The name of each chemical stripper;</p> <p>b. The VOC, HAP and methylene chloride content in units of pounds per gallon for each chemical stripper; and</p> <p>c. The amount of each VOC, HAP and methylene chloride-containing chemical stripper used, in units of gallons, during each month and in each 12 consecutive month period.</p>
10	<p>8. The permittee shall maintain comprehensive and accurate records for all the adhesive application materials which shall include:</p> <p>a. the name of each adhesive material;</p> <p>b. the VOC and HAP content in units of pounds per gallon for each adhesive material as applied; and</p> <p>c. the amount of each VOC and/or HAP-containing adhesive used, in units of gallons, during each month and in each 12 consecutive month period.</p>

Table 4	
EU#	Recordkeeping Requirements
Facility-wide	<p>9. The permittee shall maintain inventory management system records of the paint spraying operation, surface preparation, facility-wide cleanup, repainting and the adhesive application materials (i.e. coatings, chemical strippers, surface preparations, adhesives, cleanup solvents, etc.) on a monthly basis. The inventory management system records shall be summarized and include:</p> <ul style="list-style-type: none"> a. each material/coating category, material/coating or material/coating component, as identified on the container; b. the quantity of each material/coating or component material; and c. the maximum VOC and HAP content (in pounds per gallon) of each material/coating (after mixing according to the manufacturer's instructions).
	<p>10. 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. An 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 .</p>
	<p>11. The Permittee shall maintain records of monitoring and testing as required by Table 3.</p>
	<p>12. The Permittee shall maintain a copy of this Plan Approval and the underlying Application approved herein on-site.</p>
	<p>13. 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.</p>
	<p>14. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), 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.</p>
	<p>15. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.</p>
<p>16. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.</p>	

Table 4 Key:

- EU# = Emission Unit Number
- PCD = Pollution Control Device
- USEPA = United States Environmental Protection Agency
- VOC = Volatile Organic Compounds
- Total HAPs= Total Hazardous Air Pollutants

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 Western Regional Office of MassDEP, BWP Permit Chief by telephone, [413-755-2115], email, [marc.simpson@state.ma.us] or fax [413-784-1149] 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 Permit Chief at MassDEP within three (3) 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 provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP’s request.
	4. 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.
	5. 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
 BWP = Bureau of Waste Prevention

4. SPECIAL TERMS AND CONDITIONS

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

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

Table 6	
EU#	Special Terms and Conditions
1 2 3 4 5 6	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., spray guns shall utilize one of the following methods of spray application and be maintained and operated in accordance with the recommendations of the manufacturer: <ul style="list-style-type: none"> a. Electrostatic spray application; or b. High Volume Low Pressure (HVLP) spray application; or c. Any other coating application method that achieves a transfer efficiency equivalent to electrostatic or HVLP spray application and is approved by the MassDEP in writing.

Table 6

EU#	Special Terms and Conditions
1 2 3 4 5 6	<p>2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, EU #1,2,3,4,5 and 6 shall utilize two or more layers of dry fiber mat filter with a total thickness of at least two inches or an equivalent system as determined in writing by the MassDEP and that achieves particulate control efficiency of at least 99.84% by weight. Filter material shall be disposed in accordance with all applicable MassDEP regulations.</p> <p>3. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the face velocity of air at EU #1,2,3,4,5 and 6 shall not exceed 200 feet per minute.</p> <p>4. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, spray-applied coating operations shall not be conducted outside of the paint spray booth, bays or mobile ventilated enclosure.</p> <p>Spray-applied coating operations mean coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. Spray-applied coatings do not include the following materials or activities:</p> <ul style="list-style-type: none"> a. Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters). b. Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens. <p>5. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the mobile ventilated enclosure (EU #6) that is used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.</p>
7	<p>6. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, spray guns shall be cleaned in a device that:</p> <ul style="list-style-type: none"> a. minimizes solvent evaporation during the cleaning, rinsing, and draining operations; b. recirculates solvent during the cleaning operation so that the solvent is reused; and, c. collects spent solvent in a container with a tight-fitting cover so that it is available for proper disposal or recycling.
9	<p>7. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, non-chemical depainting operations shall only be performed using a HEPA vacuum assisted hand sander. The use of dry media blasting equipment is prohibited.</p> <p>8. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the permittee shall:</p> <ul style="list-style-type: none"> a. Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating). b. Evaluate each application where a paint stripper containing methylene chloride is used to ensure that there is no alternative paint stripping technology that can be used. c. Reduce exposure of all paint strippers containing methylene chloride to the air. d. Optimize application conditions when using paint strippers containing methylene chloride to reduce HAP evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

Table 6	
EU#	Special Terms and Conditions
Facility-wide	<p>9. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the permittee shall comply with the following work practices:</p> <ol style="list-style-type: none"> a. Store all VOC and/or HAP-containing paints, primers, catalysts, resins, adhesives, sealants, adhesive primers, sealant primers, process-related waste materials, fresh and spent cleaning solvents and VOC and/or HAP-containing materials in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing paints, primers, catalysts, resins, adhesives, sealants, adhesive primers, sealant primers, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing paints, primers, catalysts, resins, adhesives, sealants, adhesive primers, sealant primers, process-related waste materials, and VOC and/or HAP-containing materials; d. convey VOC and/or HAP-containing paints, primers, catalysts, resins, adhesives, sealants, adhesive primers, sealant primers, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: (i) equipment cleaning is performed without atomizing the cleanup solvent; and, (ii) all spent solvent is captured in closed containers; and f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing paints, primers, catalysts, resins adhesives, sealants, adhesive primers, sealant primers, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container. <p>10. All air pollution control system monitoring devices including, but not limited to, differential pressure gauges, pressure tap lines, thermocouples, flow rate meters, and chart recorders shall be maintained in good working order and calibrated in accordance with the manufacturers' recommendations.</p> <p>11. The spray application of coatings that contain the target HAP, as defined in 40 CFR Section 63.11180, to a plastic and/or metal substrate on a part or product and paint stripping using methylene chloride for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic and other substrates may be subject to Subpart HHHHHH of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63.11169 through 63.11180. Since MassDEP has not accepted delegation for 40 CFR Part 63 Subpart HHHHHH for sources which are not subject to 310 CMR Appendix C (Operating Permit sources), you are advised to consult with the USEPA for additional information. There may be additional notification, recordkeeping and reporting requirements. The address is EPA-Air Branch, 1 Congress Street, Suite 1100, Boston, Massachusetts, 02114-2023.</p>

Table 6 Key:

- EU# = Emission Unit Number
- USEPA = United States Environmental Protection Agency
- VOC = Volatile Organic Compounds
- Total HAPs= Total Hazardous Air Pollutants
- CFR = Code of Federal Regulations

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

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1	>40	2.83	>40	ambient
2	>50	2	>40	ambient
3	>50	2	>40	ambient
4	>50	2	>40	ambient
5	>50	2	>40	ambient
6 ¹	TBD ²	TBD	>40	ambient

Table 7 Key:

EU# = Emission Unit Number
 °F = Degree Fahrenheit
 TBD = To Be Determined

- (1) In the event that EU #6 is being exhausted indoors, the requirements of Table 7 do not apply.
- (2) The minimum exit stack height shall be 10 feet above roof level.

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. 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.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at (413) 755-2234, or in writing at the letterhead address.

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.

Marc Simpson
Air Quality Permit Chief
Bureau of Waste Prevention
Western Region

cc: WERO AQ plan file
WERO AQ approval file

ecc: Yi Tian, DEP Boston
Peter Czapienski, DEP Western Region