



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 627 Main Street, Worcester MA 01608 • 508-792-7650

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March 15, 2013

Mr. Bob Lattanzi
Hood Distribution
91 Fitchburg Road
Ayer, MA 01432

RE: Ayer
Transmittal No.: X252738
Application No.: CE-12-029
Class: SM-25
FMF No.: 406964
AIR QUALITY PLAN APPROVAL

Dear Mr. Lattanzi:

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 construction and operation of wood milling equipment and wood residue capture systems at your lumber distribution facility located at 91 Fitchburg Road in Fitchburg, 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

The Permittee operates a lumber distribution facility at 91 Fitchburg Road in Ayer ("the Facility"). On September 19, 2012, MassDEP received the present application for the installation of lumber millwork equipment at the Facility. The proposed lumber milling will generate wood shavings, cutoff pieces, etc. collectively known as "wood residue", which will be pneumatically conveyed to two cyclones to collect the pieces. Air vented from the cyclones will contain small amounts of fine wood dust particulate matter ("PM"). The wood residue collected in the cyclone bins will in turn be blown into truck trailers in a closed-loop system that does not vent to the ambient air. The wood residue will be sold as product.

The cyclones and blower to convey the collected wood residue will be located outdoors. The sound levels emanating from this equipment will be mitigated by constructing an insulated enclosure around them.

MassDEP has determined that Best Available Control Technology ("BACT") for this lumber milling consists of minimizing PM emissions by the following measures:

- No sanding will be performed on the wood.
- The cyclones will be properly operated in accordance with manufacturer's specifications at all times the wood milling is being done.
- The hours of operation of wood milling will be limited to 2000 hours per year.

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	Millwork equipment and two wood residue cyclones	6,000 cubic feet per minute per cyclone	None

Table 1 Key:
 EU# = Emission Unit Number
 PCD = Pollution Control Device

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 (Note 1)
1	1. Wood Sanding shall not be performed at this Facility.	PM	5 tons per year (calculated on the basis of tons per consecutive 12-month period) 1 ton per month
	2. The cyclones shall operate at all times wood is being milled.		
	3. Wood milling hours of operation shall be limited to 2000 hours per year (hours per consecutive 12-month period)		
		Opacity	Less than 10% at all times

Table 2 Notes:

Note 1: PM emissions shall be calculated by multiplying the hours of wood milling operation by the emission rate of 5.0 pounds PM per hour.

Table 2 Key:

EU# = Emission Unit Number
 PM = Total Particulate Matter
 % = Percent

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
1	<p>1. The Permittee shall install an hour meter on the wood residue pneumatic conveying system, and make entries of the operating hours in a daily logbook, in order to demonstrate compliance with the hourly limitations established in Table 2.</p> <p>2. The Permittee shall monitor the cyclone operation to ensure proper operation. Such monitoring shall include visual observation of the cyclone stacks to ensure there are no excess emissions. The visual observation shall be noted in the operating hours logbook, and shall be done no less frequently than once per week, or more often if deemed necessary.</p> <p>3. Within 60 days after initial startup of EU #1, the Permittee shall conduct sound level monitoring of the actual sound levels produced by the Facility while it is operating, to verify compliance with the MassDEP noise guidelines. The Permittee shall submit the proposed sound monitoring protocol to MassDEP 30 days prior to the monitoring to obtain approval. The sound monitoring shall follow the approved protocol.</p>
Facility-wide	<p>4. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.</p> <p>5. 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</p>

Table 3 Key:
 EU# = Emission Unit Number

Table 4	
EU#	Record Keeping Requirements
Facility-wide	<p>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. 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>2. The Permittee shall maintain records of monitoring and testing as required by Table 3.</p>

Table 4	
EU#	Record Keeping Requirements
	3. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU and cyclones approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU, cyclones 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.
	5. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU and cyclone 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 Central Regional Office of MassDEP, BWP Permit Chief by telephone: 508-767-2845, email: CERO.Air@massmail.state.ma.us or fax : 508-792-7621, 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).

Table 5	
EU#	Reporting Requirements
	3. The Permittee shall report 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.
	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

The Permittee is subject to, and shall comply with, the following 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
1	1. The Permittee shall construct an enclosure around the outdoor cyclones and blower sufficient to minimize the potential noise impacts and maintain compliance with MassDEP's noise guidelines, prior to starting operations.
Facility Wide	2. The Permittee shall not cause or contribute to a condition of air pollution from noise, dust or odor from the Facility. The Permittee shall add pollution control equipment or change operations if deemed necessary by MassDEP in order to prevent air pollution.

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 equipped with a “rain ell” to protect the dry wood residue from precipitation, while allowing free exhaust dispersion in the horizontal direction.
- 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)
1 (two separate cyclone stacks)	22	19 inches	55	Ambient

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.

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 Paul Dwiggins by telephone at 508-767-2760, 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.

Roseanna E. Stanley
Acting Permit Chief
Bureau of Waste Prevention

Enclosure

ecc: Ayer Board of Health
Ayer Fire Department
MassDEP/Boston - Yi Tian
C. Rollins, H.M. Rollins Company