



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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Secretary

DAVID W. CASH  
Commissioner

July 30, 2014

Mr. Milton Francis  
Plastican, Inc., a division of BWAY  
Corporation  
196 Industrial Road  
Leominster, MA 01453

**RE: Leominster**  
Transmittal No.: X259367  
Application No.: CE-14-007  
Class: *SubMin*  
FMF No.: 132727  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Francis:

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 amendment of Plan Approval Tr. No. 47345 applicable to your facility located at 196 Industrial Road in Leominster, 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-N, 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

Plastican, Inc., a division of BWAY Corporation, is a printed plastic pail manufacturing facility. The Facility produces high density polyethylene pails by injection molding. The pails are labeled by affixing plastic labels or by printing using ultraviolet cure offset printing with low-volatile organic compound (VOC) inks.<sup>1</sup> The Facility emits VOC and hazardous air pollutants (HAP) from operations incidental to the pail manufacturing and printing operations. Incidental operations are ink clean up, parts washing, lid lubrication, clean up and maintenance, and molding preparation and treatment. All emissions are fugitive emissions. There are no stack emissions.

Sources of VOC or HAP emissions are:

- Print Room Operations (Emission Unit (EU) 1) A solvent plunger can is filled with isopropanol from a 20-gallon drum and the solvent is applied to rags that are used to clean ink from offset printing equipment. Wash Up Evap A, a mineral spirits based solvent, is used in cold cleaning of metal parts.
- Lid Lubrication (EU2), involves spraying Stoner Silicone M313 (a VOC containing silicone lubricant), on screw pail lids prior to screwing the lid on the pail.
- Clean up and Maintenance (EU3), involves dispensing free penetrate oil, a petroleum distillates based lubricant (a VOC), from 12-ounce aerosol cans to maintain machinery. Cold cleaning, using Crystal Clean Premium 142 Mineral Spirits (a VOC), is used to clean metal parts.
- Molding Preparations and Treatment (EU4), involves cleaning and protecting the molds used to produce pails on injection molding equipment. The following products are used:
  - TEKUSOLV II mold cleaner (a VOC), is put into a squeeze bottle from a 20 gallon drum. The mold cleaner is dispensed to rags that are used to wipe surfaces clean,
  - Slide Mold Shield Rust Preventative (a VOC and contains HAPs) (12 ounce aerosol can), and
  - Slide Mold Cleaner Plus Degreaser (a VOC and contains HAPs) (12 ounce aerosol can).

The following equipment is used at the Facility, but is exempt from MassDEP regulation: injection molding machines, grinders, plastic resin storage silos, and space heaters.

The purpose of this Limited Plan Application is to amend current Plan Approval Tr. No. 47345, issued on February 18, 1993 to:

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<sup>1</sup> Although the low-VOC inks could contain up to 0.1% VOC, there are no emissions from the inks because the ultraviolet cure process transforms the inks from a liquid state to a solid state with no loss of volume.

- remove three silk screen printers that are no longer used at the Facility and associated VOC emissions from the current Plan Approval,
- reduce allowable VOC emissions from 4.5 tons per year to 2.57 tons per year, and
- update the Plan Approval to include other VOC and HAP emitting operations.

**This Plan Approval, Tr. No. X259367 will supersede the existing Plan Approval Tr. No. 47345 in its entirety.**

Best Available Control Technology for the Facility is the use of best management practices and pollution prevention for VOC and HAP emitting operations.

## **2. EMISSION UNIT IDENTIFICATION**

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

<b>Table 1</b>			
<b>EU</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
1	Print Room Operations	NA	None
2	Lid Lubrication	NA	None
3	Clean up and Maintenance	NA	None
4	Molding Preparations and Treatment	NA	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:

<b>Table 2</b>			
<b>EU</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>
Facility-wide	1. None	VOC	<ul style="list-style-type: none"> <li>• 1,500 pounds per month</li> <li>• 2.57 tons per 12 month rolling period</li> </ul>
	2. None	HAP (single) (trichloroethylene)	<ul style="list-style-type: none"> <li>• 35 pounds per month</li> <li>• 0.21 tons per 12 month rolling period</li> </ul>
	3. None	HAP (total)	<ul style="list-style-type: none"> <li>• 90 pounds per month</li> <li>• 0.27 tons per 12 month rolling period</li> </ul>

**Table 2 Key:**

EU = Emission Unit Number  
 HAP (single) = maximum single Hazardous Air Pollutant

HAP (total) = total Hazardous Air Pollutants  
 VOC = Volatile Organic Compounds

**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:

<b>Table 3</b>	
<b>EU</b>	<b>Monitoring and Testing Requirements</b>
	<ol style="list-style-type: none"> <li>1. Emissions subject to this Plan Approval are fugitive emissions; however, 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.</li> <li>2. At least 30 days prior to emission testing, the Permittee shall submit to MassDEP for approval a stack emission pretest protocol.</li> </ol>

<b>Table 3</b>	
<b>EU</b>	<b>Monitoring and Testing Requirements</b>
	3. Within 45 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.

**Table 3 Key:**

EU = Emission Unit Number

<b>Table 4</b>	
<b>EU</b>	<b>Record Keeping Requirements</b>
Facility-wide	<p>1. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminants emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). The Permittee may use purchasing, usage and/or inventory records to determine monthly emissions. These records shall be compiled no later than the 15<sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at:  <a href="http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping">http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping</a>.</p> <p>2. The Permittee shall maintain records of monitoring and testing as required by Table 3.</p> <p>3. The Permittee shall maintain a copy of this Plan Approval and the underlying Application approved herein on-site.</p> <p>4. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EUs. 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>5. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.</p> <p>6. 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

<b>Table 5</b>	
<b>EU</b>	<b>Reporting Requirements</b>
Facility-wide	<ol style="list-style-type: none"> <li>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).</li> <li>2. The Permittee shall notify the Central Regional Office of MassDEP, 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 three (3) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to the Permit 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).</li> </ol>

**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 below:

<b>Table 6</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
1	<ol style="list-style-type: none"> <li>1. The Permittee shall dispense isopropanol to wiping cloths for clean-up of offset printing equipment using a solvent plunger can. The solvent plunger can shall be designed so the solvent reservoir is not exposed to air and to allow surplus isopropanol pumped to the upper pan to drain back into the can.</li> </ol>
1 and 3	<ol style="list-style-type: none"> <li>2. The Permittee shall degrease parts requiring cleaning by solvent immersion only in a cold cleaner. The cold cleaner shall be equipped with a cover. The cover shall remain closed when the cold cleaner is not in use. This item does not preclude the use of a vapor degreaser that complies with 310 CMR 7.03(8). The vapor degreaser shall be operated in compliance with 310 CMR 7.18(8)(b) or (c).</li> </ol>

<b>Table 6</b>	
<b>EU</b>	<b>Special Terms and Conditions</b>
1 - 4	3. The Permittee shall use the following best management practices and pollution prevention to minimize VOC and HAP emissions: <ul style="list-style-type: none"> <li>• use the smallest amount of VOC and HAP containing materials needed to perform the task,</li> <li>• store spent VOC and HAP containing wiping rags in closed containers, and</li> <li>• cover or close any container that contains VOC or HAP containing materials when materials are not being added to or removed from the container.</li> </ul>
4	4. The Permittee shall dispense mold cleaner to wiping cloths with a controlled flow dispenser, such as a squeeze bottle.
Facility-wide	5. This Plan Approval, Tr. No. X295367, supersedes Plan Approval Tr. No. 47345, issued to the Permittee on February 18, 1993, in its entirety.

**Table 6 Key:**

EU = Emission Unit Number  
 HAP = Hazardous Air Pollutants

VOC = Volatile Organic Compounds

**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. 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 Stephen Majkut by telephone at 508-767-2773, e-mail at [stephen.majkut@state.ma.us](mailto:stephen.majkut@state.ma.us) 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.*

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Stephen Majkut  
Environmental Engineer  
Bureau of Waste Prevention

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Roseanna E. Stanley  
Permit Chief  
Bureau of Waste Prevention

ecc: Leominster Health Department  
Leominster Fire Department  
MassDEP/Boston - Yi Tian  
MassDEP/CERO – Kim McCoy  
Qaiser Baig, Cornerstone Environmental Health and Safety, Inc.