



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

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March 28, 2012

Mr. Hubert McGovern
Senior Vice President and General Manager
OMG, Inc.
153 Bowles Road
Agawam, MA 01001

RE: AGAWAM
Transmittal No.: X239646
Application No.: 1-P-12-006
Class: SM-25
FMF No.: 131657
**AIR QUALITY PLAN
APPROVAL**

Dear Mr. McGovern:

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 facility wide Hazardous Air Pollutant (HAP) emission limit at your manufacturing facility located at 153 Bowles Road in Agawam, 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

OMG, Inc. manufactures fasteners at its Agawam facility. OMG operates two (2) Model S24 Spring Tools Product Coaters (“Dip-Spin Coaters”) and a Therma-Tron-X (or equivalent) Electrocoating (“e-coat”) process line for the application of coatings to miscellaneous metal parts. Each coater has a dedicated natural gas fired drying oven. In 2009 a Beltran Wet Electrostatic Precipitator (“WESP”) was installed on the e-coat paint system oven exhaust to mitigate opacity.

The majority of the facility volatile organic compounds (“VOC”) and hazardous air pollutants (“HAP”) emissions come from the Dip-Spin coating process. The potential VOC emissions from the Dip-Spin process are 8.4 tons per year using low-VOC coatings. The e-coat process line, utilizing low VOC content coatings approved on October 20, 2005 (Approval #1-P-05-042) has a potential to emit of 3.1 tons VOC/year emissions.

In the application, OMG requests to clarify its status as a non-major source for hazardous air pollutants by proposing a facility-wide HAP emission limit of 9.0 tons per year. **This current Approval is for a limit on facility-wide emissions and does not approve the installation of any new equipment at the facility. Please be aware that all provisions of existing DEP approvals continue to apply.**

2. SPECIAL PROVISIONS OF APPROVAL

OMG, Inc. shall not exceed the emission limits specified in Table 1 regulated by this Plan Approval:

Table 1: Facility Wide Emissions of Total HAP		
Emission Unit (EU) - Description	tons/month⁽¹⁾	tons/year⁽²⁾
Facility-Wide	1.5	9.0

Table 1 Key:

- (1) per calendar month
- (2) per consecutive 12-month period

3. 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.

4. 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.

5. 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.

Should you have any questions concerning this Plan Approval, please contact Todd Wheeler by telephone at (413) 755-2297, 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.

3/28/2012

Date

Marc Simpson
Permit Chief
Bureau of Waste Prevention

MS/tw

ecc:

MassDEP/Boston - Yi Tian
MassDEP/WERO – Peter Czapienski