



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WESTERN REGIONAL OFFICE

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Lieutenant Governor

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January 25, 2010

Ida E. McDonnell, Manager
Air Permits, Toxics and Indoor Air Unit
EPA – New England, Region 1
5 Post Office Sq. Suite 100
Mail Code OEP05-2
Boston, MA 02109-3912

Re: PVAPCD – Holyoke
310 CMR 7.00 – APPENDIX C
Appl. #1-O-04-005; Trans. #W046129
FINAL OPERATING PERMIT – RENEWAL

Dear Ms. McDonnell:

In accordance with 310 CMR 7.00 – APPENDIX C(6) of the Air Pollution Control Regulations ("the Regulations"), the Department of Environmental Protection ("MassDEP") is forwarding to EPA the attached FINAL Operating Permit for the Hazen Paper Company facility located in Holyoke, Massachusetts.

Public notice of the Draft Operating Permit was published by the MassDEP in the Springfield Union News on October 6, 2009 and in the Environmental Monitor on October 26, 2009, in accordance with the requirements of 310 CMR 7.00: Appendix C. As such, the public comment period ended on November 30, 2009. During that period, no public hearing was requested pursuant to 310 CMR 7.00: Appendix C(6)(f).

On December 3, 2009 the MassDEP forwarded to EPA Region 1, via electronic mail, the Proposed Operating Permit for this facility. EPA did not object or comment on the Proposed Operating Permit, nor did EPA receive a petition to object to the Proposed Operating Permit within the regulatory deadlines. Therefore, the MassDEP is issuing the Final Operating Permit.

The attached Final Operating Permit contains all of the federal and state air pollution control requirements to which the facility is subject, and the terms and conditions for compliance with such applicable requirements.

If you have any questions concerning this FINAL Operating Permit, please contact John Kirzec of the Western Regional Office at (413) 755-2225.

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
Permit Chief
Western Region

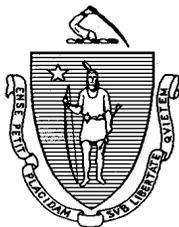
JK/jk

cc: Timothy R. McDonald, V. P. Technical Services
Hazen Paper Company
240 South Water Street
Holyoke, Massachusetts 01041-0189

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AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("MassDEP") pursuant to its authority under M.G.L. c. 111, §142B and §142D, 310 CMR 7.00 et seq., and in accordance with the provisions of 310 CMR 7.00: Appendix C.

ISSUED TO ["the Permittee"]:

Hazen Paper Company
240 South Water Street
Holyoke, MA 01040

INFORMATION RELIED UPON:

[Ref. Appl. #1-O-95-079; Trans. #109135]
Appl. #1-O-04-005; Trans. #W046129

FACILITY LOCATION:

Hazen Paper Company
240 South Water Street
Holyoke, MA 01040

FACILITY IDENTIFYING NUMBERS:

AQ ID: # 042/0128
FMF FAC: # 130878
FMF RO: # 50073

NATURE OF BUSINESS:

Paper & Allied Products

Standard Industrial Code:

- 2672 – Coated & Laminated Paper (not otherwise classified)
- North American Industrial Classification System Code:**
- 322222 – Coated & Laminated Paper Manufacturing

RESPONSIBLE OFFICIAL:

Name: John H. Hazen
Title: President

FACILITY CONTACT PERSON:

Name: Timothy McDonald
Title: V. P. Technical Services
Phone: (413) 538-8204

This operating permit shall expire on January 25, 2015.

For the Department of Environmental Protection

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.

Michael Gorski
Regional Director
Department of Environmental Protection
Western Regional Office

January 25, 2010

Date

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SPECIAL CONDITIONS FOR OPERATING PERMIT

A legend to abbreviated terms found in the following tables is located in Section 28 of this Operating Permit.

1. PERMITTED ACTIVITIES

In accordance with the provisions of 310 CMR 7.00: Appendix C and applicable rules and regulations, the Permittee (Hazen Paper Company, hereinafter "Hazen Paper") is authorized to operate air emission units as shown in Table 1 and exempt and insignificant activities as described in 310 CMR 7.00: Appendix C(5)(h) and (i). The units described in Table 1 are subject to the terms and conditions shown in Sections 4, 5, and 6 and to other terms and conditions as specified in this permit. Emissions from the exempt activities shall be included in the total facility emissions for the emission-based portion of the fee calculation described in 310 CMR 4.00 and this permit.

DESCRIPTION OF FACILITY AND OPERATIONS

The Hazen Paper Company is a paper converter specializing in film and foil laminations, gravure printing, specialty coating, and rotary embossings. The facility consists of one (1) laminator, three (3) laminator-gravure coaters, three (3) printer gravure coaters, one small boiler, several cold cleaning degreasers, and a stationary coating mix tank. The primary air pollution control device is a REECO regenerative thermal oxidizer. Hazen Paper Company operates under a Compliance Assurance Monitoring (CAM) plan dated August 28, 2009 conforming to the requirements of 40 CFR Part 64, and which is incorporated into the Renewal Operating Permit. Hazen keeps records of HAP emissions to demonstrate non-major source applicability. Therefore the requirements of 40 CFR Part 63 MACT standards do not apply.

2. EMISSION UNIT IDENTIFICATION

The following emission units (Table 1) are subject to and regulated by this operating permit:

Table 1			
Emission Unit (EU)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
EU 1	No. 1 Laminator	≈ 500 feet per minute	none
EU 2	No. 2 Laminator-Gravure coater	≈ 833 feet per minute	none
EU 3	No. 3 Laminator-Gravure coater	≈ 666 feet per minute	none
EU 4	No. 4 Laminator-Gravure coater	≈ 833 feet per minute	catalytic oxidizer
EU 5	No. 3 Printer-Gravure coater	≈ 333 feet per minute	REECO thermal oxidizer
EU 6	No. 5 Printer-Gravure coater	≈ 215 feet per minute	REECO thermal oxidizer
EU 9a	Boiler: Cleaver Brooks Model CB 2000-150	6.3 MMBtu/hr	none
EU 9b	Boiler: Hurst Model 100HP LPE	4.2 MMBtu/hr	none
EU 10	cold cleaning degreasers/parts washers	various	none
EU 11	No. 6 Printer-Gravure coater	≈ 750 feet per minute	REECO thermal oxidizer

3. IDENTIFICATION OF EXEMPT ACTIVITIES

The following are considered exempt activities in accordance with the criteria contained in 310 CMR 7.00: Appendix C(5)(h):

Table 2	
Description of Current Exempt Activities	Reason
The list of current exempt activities is contained in the Operating Permit application and shall be updated by the Permittee to reflect changes at the facility over the permit term. An up-to-date copy of exempt activities list shall be kept on-site at the facility and a copy shall be submitted to the MassDEP's Regional Office. Emissions from these activities shall be reported on the annual emissions statement pursuant to 310 CMR 7.12	310 CMR 7.00:Appendix C(5)(h)

4. APPLICABLE REQUIREMENTS

A. EMISSION LIMITS AND RESTRICTIONS – The Permittee is subject to the process and fuel equipment emission limits/restrictions as contained in Table 3a & 3b below:

Table 3a				
EU #	Raw Material	Pollutant	Emission Limit/Standards	Applicable Regulation and/or Approval No.
EU 1	coatings & inks	VOC	≤ 4.8 lb VOC/GSA ⁽²⁾ Line speed ≤ 500 ft/min when coatings are > 1.4 lb VOC/GSA.	Regulation 310 CMR 7.18(14) MassDEP Approval 1-P-95-062 (4/14/97) MassDEP Approval 1-P-90-046 (8/31/90; amended 11/3/95)
EU 2	coatings & inks	VOC	≤ 4.8 lb VOC/GSA ⁽¹⁾	Regulation 310 CMR 7.18(14)
EU 3	coatings & inks	VOC	≤ 3.18 lb VOC/GSA ⁽¹⁾ ; ≤ 20 tons/year ⁽⁴⁾ ≤ 3333 lb VOC/calendar month	MassDEP Approval 1-P-88-030 (2/3/89) MassDEP Approval 1-P-94-066 (11/16/94)
EU 4	coatings & inks	VOC	≤ 4.8 lb VOC/GSA ⁽¹⁾ (after control) $\geq 95.0\%$ VOC destruction in catalytic oxidizer ≥ 650 °F catalyst inlet temperature ≤ 6933 lb/calendar month; ≤ 95.7 lb VOC/GSA (before control); ≤ 41.6 tons/year ⁽⁴⁾ if ≤ 4.8 lb VOC/GSA ⁽²⁾ (before control), may vent to atmosphere	MassDEP Approval 1-P-88-030 (2/3/89) Regulation 310 CMR 7.18(14) Regulation 310 CMR 7.00 Appendix C(9)(b)2. MassDEP Approval 1-P-94-066 (11/16/94) Regulation 310 CMR 7.18(14)
EU 5	coatings & inks	VOC	≤ 4.8 lb VOC/GSA ⁽¹⁾ (after control) REECO RTO: $\geq 99.0\%$ VOC destruction efficiency ⁽³⁾ & ≥ 1400 °F exhaust gas temp.	Regulation 310 CMR 7.18(14) MassDEP Approval 1-P-98-013 (6/16/98)

- (1) In accordance with 310 CMR 7.18(2)(a), a three-hour averaging time applies.
- (2) In accordance with 310 CMR 7.18(2)(a), an instantaneous averaging time applies.
- (3) At $\geq 80\%$ of the maximum rated inlet VOC loading
- (4) Rolling twelve month total
- (5) Each coating station considered separately

Table 3b				
EU #	Raw Material	Pollutant	Emission Limit/Standards	Applicable Regulation and/or Approval No.
EU 6	coatings & inks	VOC	≤ 4.8 lb VOC/GSA ⁽¹⁾ (after control) REECO RTO: $\geq 99.0\%$ VOC destruction ⁽³⁾ & $\geq 1400^\circ\text{F}$ exhaust gas temp. ≤ 1666 lb/calendar month; ≤ 10.0 tons/year ⁽⁴⁾	MassDEP Approval 1-P-98-013 (6/16/98) Regulation 310 CMR 7.18(14) MassDEP Approval 1-P-88-030 (2/3/89)
EU 9a	natural gas & #2 oil	PM ⁽¹⁾	0.10 lb/MMBtu ⁽²⁾	MassDEP Approval PV-85-C-009 (8/27/85)
		Smoke	No. 1 of the Chart no more than 6 minutes during any one hour, no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Sulfur in fuel	0.17 lb/MMBtu ($\approx 0.3\%$ S by weight)	Regulation 310 CMR 7.05(1)(a)2.
EU 9b	natural gas & #2 oil	PM ⁽¹⁾	0.10 lb/MMBtu ⁽²⁾	310 CMR 7.02(8)(h) Table 6
		Smoke	No. 1 of the Chart no more than 6 minutes during any one hour, no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Sulfur in fuel	0.17 lb/MMBtu ($\approx 0.3\%$ S by weight)	Regulation 310 CMR 7.05(1)(a)2.
EU 10	cleaning solvent	VOC ⁽³⁾	Each degreaser shall use less than 100 gallons of solvent per calendar month	Regulation 310 CMR 7.03(5) Regulation 310 CMR 7.18(8)(a)
EU 11	coatings & inks	VOC	If ≤ 4.8 lb VOC/GSA ⁽¹⁾⁽⁵⁾ (after control) and with up to 100% VOC cleanup solution, must capture with 100% efficiency & use REECO RTO: $\geq 99.0\%$ VOC destruction ⁽³⁾ & $\geq 1400^\circ\text{F}$ exhaust gas temp. or If < 2.4 lb VOC/GSA ⁽²⁾⁽⁵⁾ (before control) and cleanup solution contains $\leq 15\%$ VOC, may vent to atmosphere; $\leq 9,000$ lb/calendar month; ≤ 23.5 tons/year ⁽⁴⁾	MassDEP Approval 1-P-95-062 (4/14/97) MassDEP Approval 1-P-98-013 (6/16/98) Regulation 310 CMR 7.18(14)
Facility-Wide	various	Opacity	$< 20\%$, except 20 to $< 40\%$ for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
		Hazardous Air Pollutants	≤ 9.9 tons any single HAP ≤ 24.9 tons total HAP	40 CFR 63.829(d) 40 CFR 63.830(b)(1)

- (1) Particulate matter as measured according to the applicable procedures specified in 40 CFR Part 60 Appendix A, Method 5.
- (2) Based on a one hour average.
- (3) Petroleum hydrocarbon (contains no halogens)

B. COMPLIANCE DEMONSTRATION – The Permittee is subject to the monitoring, testing, recordkeeping, and reporting requirements as contained in Tables 4a / 4b / 4c, 5a / 5b, and 6 below and 310 CMR 7.00 Appendix C (9) and (10): and applicable requirements as contained in Table 3a & 3b, unless otherwise specified below.

Table 4a	
EU #	Monitoring/Testing Requirements
EU 4	Hazen Paper shall <ol style="list-style-type: none"> 1) In accordance with Regulation 310 CMR 7.18((2)(e), 310 CMR 7.00 Appendix C(9)(b)2., and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, continuously monitor the catalyst inlet/exit temperature (°F). 2) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, test the catalytic oxidizer temperature alarm(s) at least once per calendar year. 3) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, monitor at least once per calendar month the face velocity of each natural draft opening ("NDO") to ensure each is ≥ 200 feet per second. 4) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, monitor at least once per calendar month by means of a checklist the physical parameters of the enclosure that are indicative of 100% capture efficient operation. 5) In accordance with MassDEP Approval 1-P-88-030 (2/3/89), perform, at the request of the MassDEP, tests to characterize VOC and solids contents of the coatings used. 6) In accordance with MassDEP Approval 1-P-88-030 (2/3/89), perform VOC capture and destruction tests on the catalytic oxidizer and the #4 Laminator, at the discretion of the MassDEP.
EU 5 EU 6 EU 11	Hazen Paper shall <ol style="list-style-type: none"> 7) In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, continuously monitor the REECO RTO exhaust gas temperature (°F). 8) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, test the REECO RTO temperature alarm(s) at least once per calendar year. 9) In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, continuously monitor the total inlet airflow to the REECO RTO to ensure that the REECO RTO capacity is not exceeded. 10) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, test the REECO RTO airflow alarm(s) at least once per calendar year. 11) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, monitor at least once per calendar month the face velocity of each natural draft opening ("NDO") to ensure each is ≥ 200 feet per second. 12) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, monitor at least once per calendar month by means of a checklist the physical parameters of the enclosure that are indicative of 100% capture efficient operation.

Table 4b

EU #	Monitoring/Testing Requirements
EU 9a EU 9b	<p>Hazen Paper shall</p> <p>13) In accordance with 310 CMR 7.04(4)(a), inspect and maintain each boiler in accordance with the manufacturer's recommendations and test each boiler in accordance with the manufacturer's recommendations for efficient operation once each calendar year.</p> <p>14) In accordance with 310 CMR 7.00 Appendix C(9)(b), monitor sulfur content of each new shipment of No. 2 fuel oil received. Compliance with % sulfur-in-fuel requirements can be demonstrated through testing (<u>testing certification</u>) or by maintaining a shipping receipt from the fuel supplier (<u>shipping receipt certification</u>).</p> <p>The <u>testing certification</u> or <u>shipping receipt certification</u> of % sulfur-in-fuel shall document that sulfur testing has been done in accordance with the applicable ASTM test methods (D129-95, D1266-91, D1552-95, D2622-92, and D4294-90) or any other method approved by the MassDEP and EPA.</p>
EU 10	<p>Hazen Paper shall</p> <p>15) In accordance with 310 CMR 7.18(8)(g), upon request of the MassDEP or EPA, perform or have performed tests to demonstrate compliance with 310 CMR 7.18(8).</p>
EU 11	<p>Hazen Paper shall</p> <p>16) In accordance with MassDEP Approval 1-P-95-062 (4/14/97) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, monitor on a continuous chart recorder the position of dryer dampers, indicating when the dryer exhaust is going to the oxidizer or to atmosphere.</p> <p>17) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), upon request of the MassDEP, perform tests to characterize coating VOC and solids content, and/or tests to determine stack emissions, according to MassDEP prescribed methods.</p>
Facility-Wide	<p>Hazen Paper shall</p> <p>18) In accordance with 310 CMR 7.13 <u>Stack Testing</u>, conduct stack testing, upon written request of the MassDEP, for any air contaminant for which the MassDEP has determined testing is necessary, to ascertain compliance with the MassDEP's regulations or design approval provisos. All such testing shall be conducted in accordance with 310 CMR 7.13 (1) and (2), and in accordance with the applicable procedures specified in 40 CFR 60 Appendix A or other method if approved by the MassDEP and EPA.</p> <p>In accordance with 310 CMR 7.02(8), any compliance determination with the allowable particulate emission rate shall be in accordance with the EPA Methods 1 – 5, as specified in 40 CFR Part 60, Appendix A</p> <p>In accordance with 310 CMR 7.00 Appendix C(9)(b), any compliance determination with the allowable smoke / opacity emission limit shall be in accordance with EPA Method 9, as specified in 40 CFR 60, Appendix A.</p> <p>In accordance with 310 CMR 7.18(14)(d), upon request of the MassDEP, perform or have performed tests to demonstrate compliance. Testing shall be conducted in accordance with EPA Method 24 and/or Method 25 as described in CFR Title 40 Part 60, or by other methods approved by the MassDEP and EPA.</p>

Table 5a

EU #	Recordkeeping Requirements
EU 1	Hazen Paper shall <ol style="list-style-type: none"> 1) In accordance with MassDEP Approval 1-P-90-046 (8/31/90; amended 11/3/95), verify minimally once per calendar day, and record in a written log, that the mechanical stop installed on the #1 Laminator's drive is present and operational when using coatings containing > 1.4 lb VOC/GSA. 2) In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain on-site for a minimum of 5 years the records concerning the presence and operation of the mechanical stop under the specified conditions.
EU 1 EU 2 EU 5	Hazen Paper shall <ol style="list-style-type: none"> 3) In accordance with 310 CMR 7.18(14)(c), prepare and maintain daily records sufficient to demonstrate compliance consistent with the applicable averaging time as stated in 310 CMR 7.18(2)(a). 4) In accordance with 310 CMR 7.18(14)(c), keep records to demonstrate compliance on-site for five years and make these records available to representatives of the MassDEP and EPA upon request.
EU 3 EU 4 EU 6	Hazen Paper shall <ol style="list-style-type: none"> 5) In accordance with MassDEP Approval 1-P-88-030 (2/3/89), maintain records for the previous 5 years detailing for each day <ol style="list-style-type: none"> a) the number of gallons of each specific coating applied, and b) the VOC content of each of these coatings (lb VOC/GSA), and c) the lb VOC emitted before and after controls. 6) In accordance with MassDEP Approval 1-P-88-030 (2/3/89) and a letter from MassDEP to Hazen dated 5/17/96, generate "in-house" before the 15th of each month summary reports containing for each machine the pounds VOC emitted before and after control, and the control device efficiency, and maintain these reports on file and available to the MassDEP for review for a minimum of five (5) years.
EU 4	Hazen Paper shall <ol style="list-style-type: none"> 7) In accordance with Regulation 310 CMR 7.18(2)(e), 310 CMR 7.00 Appendix C(10)(b), and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain on-site for a minimum of 5 years the strip/circular chart records of the catalyst inlet/exit temperature, and all supporting information, including, at a minimum, all calibration and maintenance records, all original strip/circular charts, the operating conditions existing at the time of the measurement(s), and copies of any other information required to interpret the monitoring data. 8) In accordance with Regulation 310 CMR 7.18((2)(e), 310 CMR 7.00 Appendix C(9)(b)2., 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records of the date the catalyst was most recently added to, replaced, and/or changed. 9) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records of the catalytic oxidizer temperature alarm(s) except those that occur as a result of startup or shutdown. 10) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records of the face velocity of each NDO.

Table 5b

EU #	Recordkeeping Requirements
EU 5 EU 6 EU 11	<p>Hazen Paper shall</p> <p>11) In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records the REECO RTO exhaust gas temperature (°F).</p> <p>12) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records of the REECO RTO temperature alarm(s) except those that occur as a result of startup or shutdown.</p> <p>13) In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records of the total inlet airflow to the REECO RTO.</p> <p>14) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records of the REECO RTO airflow alarm(s) except those that occur as a result of startup or shutdown.</p> <p>15) In accordance with MassDEP Approval 1-P-98-013 (6/16/98), maintain up-to-date records of training and personnel who are qualified to operate the REECO RTO, and ensure that it is operated only by personnel who are trained in its proper use and operation.</p> <p>16) In accordance with 310 CMR 7.00 Appendix C(10)(b) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain on-site for a minimum of 5 years the strip/circular chart records of the REECO RTO exhaust gas temperature and all supporting information, including, at a minimum, all calibration and maintenance records, all original strip/circular charts, the operating conditions existing at the time of the measurement(s), and copies of any other information required to interpret the monitoring data.</p> <p>17) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, maintain records of the face velocity of each NDO.</p>
EU 9	<p>Hazen Paper shall</p> <p>18) In accordance with 310 CMR 7.04(4)(a), maintain records of the results of the inspection, maintenance, and annual testing required by this Regulation and post these results conspicuously on or near the boiler.</p> <p>19) In accordance with 310 CMR 7.00 Appendix C(9)(b)2., demonstrate compliance for each new shipment of No. 2 fuel oil received with the % sulfur-in-fuel requirements specified in 310 CMR 7.05(1)(a)2. by <u>testing certification</u> or <u>shipping receipt certification</u>, either of which must certify that the shipment complies with the ASTM specifications for distillate oil and the specified % sulfur-in-fuel requirements.</p>

Table 5c

EU #	Recordkeeping Requirements
EU 10	<p>Hazen Paper shall</p> <p>20) In accordance with 310 CMR 7.03(3) and 7.18(8), prepare and maintain daily records sufficient to demonstrate compliance with a solvent use rate of less than 100 gallons per calendar month.</p> <p>21) In accordance with 310 CMR 7.18(8)(f), prepare and maintain daily records sufficient to demonstrate compliance consistent with an instantaneous averaging time as stated in 310 CMR 7.18(2)(a). Records kept to demonstrate compliance shall be kept on-site for five years and shall be made available to representatives of the MassDEP and EPA upon request. Such records shall include, but are not limited to:</p> <ul style="list-style-type: none"> a) identity, quantity, formulation and density of solvent(s) used, and b) quantity, formulation and density of all waste solvent(s) generated, and c) actual operational and performance characteristics of the degreaser.
EU 11	<p>Hazen Paper shall</p> <p>22) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), establish and continue an on-site daily recordkeeping system for determining the VOC emissions from the use of inks and coatings. Emissions from cleaning operations will be determined by means of a monthly inventory system. All records shall be maintained up-to-date such that year-to-date information is readily available for MassDEP examination. Record keeping shall include sufficient operating records to demonstrate compliance with the 9,000 lb VOC/calendar month and 23.5 tons per year (rolling 12 month total) limits.</p>
Facility Wide	<p>Hazen Paper shall</p> <p>23) In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain records of all monitoring data and supporting information on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application.</p> <p>24) In accordance with 310 CMR 7.12, maintain the records required to determine the nature and amounts of emissions from the facility.</p> <p>25) In accordance with 310 CMR 7.12(3)(b), retain copies of Source Registration and other information supplied to MassDEP to comply with 310 CMR 7.12 for five years from the date of submittal.</p> <p>26) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), conduct an annual inventory of ink and solvent used in the ink mixing and storage room and solvent storage tanks, and compare annually the VOC emissions determined by the daily tracking system and VOC emissions determined by the annual inventory.</p> <p>27) In accordance with 40 CFR 63.829(d), maintain records of single/total HAP emissions demonstrating area source status (≤ 9.9 tpy single HAP; ≤ 24.9 tpy total HAP) with regards to 40 CFR Part 63 Subpart KK.</p>

Table 6	
EU #	Reporting Requirements ⁽¹⁾
EU 10	Hazen Paper shall 1) In accordance with 310 CMR 7.03(2), report to the MassDEP any construction, substantial reconstruction or alteration of a degreaser described in 310 CMR 7.03(5) on the next required Source Registration/Emission Statement, in accordance with 310 CMR 7.12.
EU 11	Hazen Paper shall 2) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), notify the MassDEP in writing prior to the 15 th day of the following month if monthly limits established for EU 11 in Table 3 of this Operating Permit are exceeded.
Facility Wide	Hazen Paper shall 3) In accordance with 310 CMR 7.12, submit a Source Registration/Emission Statement form to the MassDEP on an annual basis. 4) In accordance with 310 CMR 7.00 Appendix C(10)(c), submit to the MassDEP two compliance summaries, one by January 30 for the time period July – December of the previous calendar year, and the other by July 30 for the time period January – June of the current calendar year. (See Provision 10 in “GENERAL CONDITIONS FOR OPERATING PERMIT”) 5) In accordance with 310 CMR 7.13(1)(d), submit to the MassDEP any stack test results for any air contaminant obtained from stack testing required by the MassDEP within such time as agreed to in the approved test protocol. 6) In accordance with 310 CMR 7.00 Appendix C(5)(b)9., submit annually a certification that the facility is maintaining the required records to assure the facility is in compliance with the applicable requirements designated in this permit. (See Provision 10 in “GENERAL CONDITIONS FOR OPERATING PERMIT”) 7) In accordance with 310 CMR 7.00 Appendix C(10)(a), submit to the MassDEP any record relevant to this operating permit or to the emissions of any air contaminant from the facility within 30 days of the request by the MassDEP or EPA. 8) In accordance with 310 CMR 7.00 Appendix C(10)(f), the Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention all instances of deviations from permit requirements. (See Provision 25 in “GENERAL CONDITIONS FOR OPERATING PERMIT”).

(1)The annual Source Registration/Emission Statement report shall be submitted to the MassDEP office specified in the instructions. **All other reports, including both 6-month summary reports, are to be submitted to the Western Regional Office address, as specified on the letterhead of this Operating Permit.**

C. GENERAL APPLICABLE REQUIREMENTS –The Permittee shall comply with all general applicable requirements contained in 310 CMR 7.00 et. seq. and 310 CMR 8.00 et. seq., when subject.

D. REQUIREMENTS NOT CURRENTLY APPLICABLE – The Permittee is currently not subject to the following requirements:

Table 7	
Regulation	Reason
310 CMR 7.16: Reduction of Single Occupant Commuter Vehicle Use	Facility employs fewer than 250 people.
40 CFR Part 82: Stratospheric Ozone	Not applicable
40 CFR 63 Subpart T: National Emission Standards for Halogenated Solvent Cleaning	Not applicable
40 CFR Part 63 Subpart KK Printing and Publishing NESHAP	Facility maintaining records verifying area source status
310 CMR 7.25: Consumer and Commercial Products	Not applicable
42 U. S. C. 7401 § 112(r): Prevention of Accidental Releases	Facility does not store, use or process any of the listed compounds in quantities greater than thresholds.

5. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to the following special provisions that are not contained in Tables 3, 4, 5, and 6:

Table 8a	
EU #	Special Terms and Conditions
EU 1	<p>Hazen Paper shall</p> <ol style="list-style-type: none"> 1) In accordance with MassDEP Approval 1-P-90-046 (8/31/90; amended 11/3/95), only operate the #1 Laminator with a mechanical/physical limitation device installed that prevents operation at line speeds greater than 500 feet per minute when utilizing coatings containing > 1.4 lb VOC/GSA.
EU 4	<p>Hazen Paper shall</p> <ol style="list-style-type: none"> 2) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, ensure that the interior and exterior of the catalytic oxidizer is inspected at least annually by a qualified outside consultant or by the manufacturer's representative to ensure the oxidizer operates in accordance with the manufacturer's specifications. 3) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, ensure that during the annual catalytic oxidizer inspection, the catalyst blocks are removed and replaced with a new set of clean catalyst blocks. 4) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, ensure that the accuracy of the thermocouple is verified at least once per calendar year by a second, or redundant, thermocouple probe inserted into the oxidizer chamber with a hand held meter. The acceptance criterion shall be ± 15 °F. 5) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, ensure the circular charts are calibrated to the thermocouples at least once per calendar year in accordance with the manufacturer's procedures. 6) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, ensure that if the catalytic oxidizer inlet temperature drops below 700 deg. F, an audible alarm and flashing strobe activates to alert the operator of the problem. The airflow will be shutdown within 10 minutes of the alarm/strobe. 7) In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, operate the catalytic oxidizer exhaust gas temperature monitoring system at all times that this emission unit is operating, except for periods of calibration checks and preventive maintenance. Obtain valid temperature data for at least 90% of the hours for every 12 month period (rolling 12-month total) during which this emission unit is operating. 8) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, ensure that the anemometer used for measuring NDO face velocities is calibrated at least once per calendar year, in accordance with the manufacturer's procedures. 9) In accordance with 40 CFR Part 64 and the facility CAM Plan dated 08/28/2009, ensure that the average velocity through the NDOs is ≥ 200 feet per minute.

Table 8b

EU #	Special Terms and Conditions
EU 11	<p>Hazen Paper shall</p> <p>10) In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, operate the dryer damper position monitoring system at all times that this emission unit is operating, except for periods of calibration checks and preventive maintenance. Obtain valid dryer damper position data for at least 90% of the hours for every 12 month period (rolling 12-month total) during which this emission unit is operating.</p> <p>11) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), keep station enclosure doors closed when operating the station with a coating containing ≥ 2.4 lb VOC/GSA, except when gravure cylinders are being cleaned.</p> <p>12) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), post near Printer 6 and adhere to the criteria for VOC capture efficiency – U.S. EPA Procedure T guidelines for permanent total enclosures (PTE) for the unit. The criteria for PTE are the following:</p> <ul style="list-style-type: none"> a) All access doors, windows & hood latches are closed during normal operation. b) The interior of the PTE is under negative pressure to the outside environment. c) The average velocity through the NDOs must be greater than 200 feet per minute. d) Sources of VOC in the PTE must be at least four equivalent diameters from each NDO. e) The total area of all NDOs must be less than five percent of the total area of the enclosure. <p>13) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), route all exhaust to the REECO RTO from stations where cleaning solution containing more than 15% VOC by weight is used.</p> <p>14) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), limit throughput of VOCs through the main ink mixing room and storage room (Buildings 26 & 26A) to 2,150,000 lb per calendar year.</p> <p>15) In accordance with MassDEP Approval 1-P-95-062 (4/14/97), keep clean-up solutions containing VOCs in tightly covered containers during transport and storage; and cleaning rags used in conjunction with the clean-up solution shall be placed, when not in use, in closed containers and collected for proper disposal.</p>

Table 8c

EU #	Special Terms and Conditions
EU 5 EU 6 EU 11	<p>Hazen Paper shall</p> <p>16) In accordance with MassDEP Approval 1-P-98-013 (6/16/98), not operate the REECO RTO at airflows exceeding 25,000 SCFM.</p> <p>17) In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, equip the REECO RTO with both visual and audible alarms which will alert the operators when the exhaust gas temperature falls below 1450 deg. F.</p> <p>18) In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, operate the REECO RTO exhaust gas temperature monitoring system at all times that any of these emission units are operating (noting the exception that EU 11 may vent to atmosphere; see Table 3a), except for periods of calibration checks and preventive maintenance. Obtain valid temperature data for at least 90% of the hours for every 12 month period (rolling 12-month total) during which these emission units are operating.</p> <p>19) In accordance with 310 CMR 7.00 Appendix C(9)(b)2. and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, operate the airflow monitoring system at all times that any of these emission units are operating (noting the exception that EU 11 may vent to atmosphere; see Table 3a), except for periods of calibration checks and preventive maintenance. Obtain valid airflow data for at least 90% of the hours for every 12 month period (rolling 12-month total) during which these emission units are operating.</p> <p>20) In accordance with MassDEP Approval 1-P-98-013 (6/16/98) and 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, operate and maintain an alarm which indicates if the airflow at the inlet of the REECO RTO exceeds 25,000 SCFM.</p> <p>21) In accordance with 40 CFR Part 64 and the facility's CAM Plan dated 08/28/2009, ensure that the anemometer used for measuring NDO face velocities is calibrated at least annually in accordance with the manufacturer's procedures.</p> <p>22) In accordance with 40 CFR Part 64 and the facility CAM Plan dated 08/28/2009, ensure that the average velocity through the NDOs is \geq 200 feet per minute.</p>
Facility-Wide	<p>Hazen Paper shall</p> <p>23) Hazen Paper is subject to, and has stated in their operating permit application, Transmittal # 109135, that they are in compliance with the requirements of 40 CFR 82: Protection of Stratospheric Ozone. These requirements are applicable to this facility and the United States Environmental Protection Agency enforces these requirements.</p> <p>24) Hazen Paper shall, in accordance with 310 CMR 7.18(1)(c), store and dispose of volatile organic compounds in a manner which will minimize evaporation to the atmosphere.</p> <p>25) Hazen Paper shall, in accordance with 310 CMR 7.18(1)(d), continue to comply with all the applicable requirements of 310 CMR 7.18(14) even if emissions from the facility no longer exceed the applicability requirements therein.</p>

6. ALTERNATIVE OPERATING SCENARIOS

The permittee did not request alternative operating scenarios in its operating permit application.

7. EMISSIONS TRADING

A. Intra-facility emission trading

The facility did not request intra-facility emissions trading in its operating permit application.

Pursuant to 310 CMR 7.00: Appendix C(7)(b), emission trades, provided for in this permit, may be implemented provided the Permittee notifies the United States Environmental Protection Agency (EPA) and the MassDEP at least fifteen days in advance of the proposed changes and the Permittee provides the information required in 310 CMR 7.00: Appendix C(7)(b)3.

Any intra-facility change that does not qualify pursuant to 310 CMR 7.00: Appendix C (7)(b)2. is required to be submitted to the MassDEP pursuant to 310 CMR 7.00: Appendix B.

B. Inter-facility emission trading

All increases in emissions due to emission trading must be authorized under the applicable requirements of 310 CMR 7.00: Appendix B (the "Emissions Trading Program") and the 42 U.S.C. §7401 et. seq. (the "Act"), and provided for in this permit.

The facility did not request inter-facility emissions trading in its operating permit application.

8. COMPLIANCE SCHEDULE

The Permittee has indicated that the facility is in compliance and shall remain in compliance with the applicable requirements contained in Sections 4 and 5.

In addition, the Permittee shall comply with any applicable requirements that become effective during the permit term.

GENERAL CONDITIONS FOR OPERATING PERMIT

9. FEES

The permittee has paid the permit application processing fee and shall pay the annual compliance fee in accordance with the fee schedule pursuant to 310 CMR 4.00.

10. COMPLIANCE CERTIFICATION

All documents submitted to the MassDEP shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in compliance with 310 CMR 7.01(2) and contain the following language:

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment."

The "Operating Permit Reporting Kit" contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring Summary Report and Certification. The "Operating Permit Reporting Kit" is available to the Permittee via the MassDEP's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

(a) Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 to the MassDEP and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
- iv. any additional information required by the MassDEP to determine the compliance status of the source.

(b) Semi-Annual Monitoring Summary Report and Certification

The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 and July 30 to the MassDEP. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- i. the terms and conditions of the permit that are the basis of the certification;
- ii. the current compliance status during the reporting period;
- iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;
- iv. whether there were any deviations during the reporting period;
- v. if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
- vi. whether deviations in the reporting period were previously reported;
- vii. if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
- viii. if the deviations in the reporting period have returned to compliance and date of such return to compliance; and
- ix. any additional information required by the MassDEP to determine the compliance status of the source.

11. NONCOMPLIANCE

Any noncompliance with a permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the MassDEP and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This permit does not relieve the permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this permit.

12. PERMIT SHIELD

- (a) This facility has a permit shield provided that it operates in compliance with the terms and conditions of this permit. Compliance with the terms and conditions of this permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7, for the emission units as described in the permittee's application and as identified in this permit.

Where there is a conflict between the terms and conditions of this permit and any earlier approval or permit, the terms and conditions of this permit control.

- (b) The MassDEP has determined that the permittee is not currently subject to the requirements listed in Section 4, Table 7.
- (c) Nothing in this permit shall alter or affect the following:
- i. the liability of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - ii. the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
 - iii. the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Act.

13. ENFORCEMENT

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22, 7.70 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A

All other terms and conditions contained in this permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the MassDEP, EPA and citizens as defined under the Act.

A Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

14. PERMIT TERM

This permit shall expire on the date specified on the cover page of this permit, which shall not be later than the date 5 years after issuance of this permit.

Permit expiration terminates the permittee's right to operate the facility's emission units, control equipment or associated equipment covered by this permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

15. PERMIT RENEWAL

Upon the MassDEP's receipt of a complete and timely application for renewal, this facility may continue to operate subject to final action by the MassDEP on the renewal application.

In the event the MassDEP has not taken final action on the operating permit renewal application prior to this permit's expiration date, this permit shall remain in effect until the MassDEP takes final action on the renewal application, provided that a timely and complete renewal application has been submitted in accordance with 310 CMR 7.00: Appendix C(13).

16. REOPENING FOR CAUSE

This permit may be modified, revoked, reopened, and reissued, or terminated for cause by the MassDEP and/or EPA. The responsible official of the facility may request that the MassDEP terminate the facility's operating permit for cause. The MassDEP will reopen and amend this permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C(14).

The filing of a request by the permittee for an operating permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any operating permit condition.

17. DUTY TO PROVIDE INFORMATION

Upon the MassDEP's written request, the permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall furnish to the MassDEP copies of records that the permittee is required to retain by this permit.

18. DUTY TO SUPPLEMENT

The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a complete renewal application was submitted but prior to release of a draft permit.

The permittee shall promptly, on discovery, report to the MassDEP a material error or omission in any records, reports, plans, or other documents previously provided to the MassDEP.

19. TRANSFER OF OWNERSHIP OR OPERATION

This permit is not transferable by the permittee unless done in accordance with 310 CMR 7.00: Appendix C(8)(a). A change in ownership or operation control is considered an administrative permit amendment if no other change in the permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between current and new permittee, has been submitted to the MassDEP.

20. PROPERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.

21. INSPECTION AND ENTRY

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the MassDEP, and EPA to perform the following:

- (a) enter upon the permittee's premises where an operating permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the operating permit or applicable requirements as per 310 CMR 7.00 Appendix C(3)(g)(12).

22. PERMIT AVAILABILITY

The permittee shall have available at the facility, at all times, a copy of the materials listed under 310 CMR 7.00: Appendix C(10)(e) and shall provide a copy of the permit, including any amendments or attachments thereto, upon request by the MassDEP or EPA.

23. SEVERABILITY CLAUSE

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

24. EMERGENCY CONDITIONS

The permittee shall be shielded from enforcement action brought for noncompliance with technology based¹ emission limitations specified in this permit as a result of an emergency². In order to use emergency as an affirmative defense to an action brought for noncompliance, the permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (a) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- (b) the permitted facility was at the time being properly operated;
- (c) during the period of the emergency, the permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and
- (d) the permittee submitted notice of the emergency to the MassDEP within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response, immediate notification to the appropriate parties should be made as required by law.

25. PERMIT DEVIATION

Deviations are instances where any permit condition is violated and not reported as an emergency pursuant to section 24 of this permit. Reporting a permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements

¹ Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

² An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

listed in Table 6 of this Operating Permit shall supercede the following deviation reporting requirements, if applicable.

The Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention the following deviations from permit requirements, by telephone or fax, within three (3) days of discovery of such deviation:

- Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
- Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the permit or approval as surrogate for an emission limit.
- Exceedances of permit operational limitations directly correlated to excess emissions.
- Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the Massachusetts MassDEP of Environmental Protection Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available to the Permittee via the MassDEP's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op> .

This report shall include the deviation, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone or fax within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the permit and in compliance with all applicable requirements provided the permittee gives the EPA and the MassDEP written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(h) and (i). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C(7)(a) and will be appended to the facility's permit. The permit shield allowed for at 310 CMR 7.00: Appendix C(12) shall not apply to these changes.

27. MODIFICATIONS

- (a) Administrative Amendments – The permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).
- (b) Minor Modifications – The permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d).
- (c) Significant Modifications – The permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(c).
- (d) No permit revision shall be required, under any approved economic incentives program, marketable permits program, emission trading program and other similar programs or processes, for changes that are provided in this operating permit. A revision to the permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Act, provided that such increases do not require an operating permit revision under any other applicable requirement.

28. LEGEND OF ABBREVIATED TERMS IN OPERATING PERMIT

Not all abbreviations are present in every Operating Permit

10 ⁶ Btu/hr	1,000,000 Btu per hour
CEM	continuous emission monitor
CGA	cylinder gas audit
the Chart	the Ringelmann Scale for grading the density of smoke
CO	carbon monoxide
CO ₂	carbon dioxide
COM	continuous opacity monitor
DAS	data acquisition system
EPA or USEPA	Environmental Protection Agency
FMF FAC. NO.	Facility Master File Number
FMF RO. NO.	Facility Master File Regulated Object Number
ft ³	cubic feet
g	gram
gr	grain
gpm	gallons per minute
HHV	higher heating value
hr	hour
ISO	represents 59°F, 60% relative humidity, 29.92 inches mercury at sea level
lb	pound
lb VOC/GSA	pounds VOC per gallon solids applied
lb/MMBtu	pounds per million British thermal units
MMBtu/hr	million British thermal units per hour
MW	megawatt (1,000,000 watts)
ng	natural gas
NH ₃	ammonia
NO _x	nitrogen oxides
PLT ID	Plant Identification
PM	particulate matter
ppm	parts per million
ppmvd	parts per million (by volume, dry)
PTE	potential to emit
RATA	relative accuracy test audit
SO ₂	sulfur dioxide
tpy	tons per year
VOC	volatile organic compound

APPEAL CONDITIONS FOR OPERATING PERMIT

This permit is an action of the MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C(6), with respect to the MassDEP's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the facility must continue to comply with all existing federal and state applicable requirements to which the facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the facility shall not be in violation of the Act for operating without a permit.

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 permit 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:

The 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.

The 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.