



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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November 5, 2015

Mr. Gerard C. Lorusso
Norfolk Asphalt Company, Inc.
635 Pleasant Street
Norwood, MA 02062

RE: NORWOOD
Transmittal No.: X263804
Application No.: SE-15-011
Class: *SM-25*
FMF No.: 131160
AIR QUALITY PLAN APPROVAL

Dear Mr. Lorusso:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Non-major Comprehensive Plan Application (“Application”) listed above. This Application concerns the proposed increase in production of hot mix asphalt and fuel usage at your facility located at 635 Pleasant Street in Norwood, Massachusetts (“Facility”). The Application bears the seal and signature of Paul J. Hanbury, Massachusetts Registered Professional Engineer Number 38757.

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

Norfolk Asphalt Co. produces Asphalt by taking graded aggregate in quantities and grades determined by the desired finished product, heating the product in a dryer and combining it with liquid asphalt. The facility indicated that 100% of the aggregate material used is pre-washed. The desired final quality and purpose of the product determine the ratios of aggregates and liquid asphalt put into the system. Up to 30% of the product at Norfolk Asphalt may be recycled asphalt product (RAP).

Unit No. 1 - Hot Mix Asphalt Batch Plant

The Stansteel Model RM80 batch mix plant is capable of producing a maximum of 288 tons per hour (tph) of hot mix asphalt. The unit is equipped with a Gencor Model UF-100 air atomized burner rated at a maximum of 100 million British Thermal Units per hour (100 MMBtu/hr). The unit burns natural gas as the primary fuel at a maximum rate of 100,000 cubic feet per hour. As a secondary fuel, No. 2 fuel oil with a maximum sulfur content of 0.0015% is burned at a maximum rate of 715 (nominal) gallons per hour.

Exhaust gases from the batch mixer are vented through an existing Gencore 54" primary collector (Knockout box) followed by an existing Gencore model CFS-151 fabric filter baghouse. The baghouse is rated at 74,092 actual cubic feet per minute (ACFM) and has 872 Nomex bags with a total cloth area of 15,059 square feet resulting in an air to cloth ratio of 4.19 to 1. The baghouse outlet particulate concentration shall not exceed 0.01 grains/dry standard cubic feet (dscf) of exhaust gas at the stack. The pair of collection devices will have an overall collection efficiency of 99.97%. The exhaust gases are vented through a steel stack, the top of which is 36 feet above ground level.

Products from the hot mix batch plant may be stored in one or two, 200 ton silos. The Silos are equipped with a top of silo emission control system that consists of silo and batcher ductwork, a knock-out box with centrifugal fan, evacuation damper control, and a discharge ductwork system which feeds the combustion burner. Blue smoke, comprised of hydrocarbons, odors, and other off gases, forms naturally during the asphalt mixing and silo loading process. The displaced gases created during loading are vented back, through negative pressure, to the top of the batcher where they can occupy the volume previously holding hot mix. The blue smoke generated at the transfer points, batcher, and conveyors is directed to the burner and is converted to fuel and burned.

The batch mix plant is subject to 40 CFR 60, Subpart I, "Standards of Performance for Hot Asphalt Facilities."

Unit No. 2 - Hot Oil Asphalt Tank Heater

Unit No. 2 is a Gencor hot oil heater equipped with a Gencor Model HYC-200 burner with a maximum energy input rating of 2.0 MMBtu per hour. The unit will burn natural gas as the primary fuel. No. 2 fuel oil with a maximum sulfur content of 0.0015% will be burned as a secondary fuel. The exhaust from Unit No. 2 is vented through a steel stack, the top of which is 11.5 feet above ground level.

Description of proposed modifications:

Norfolk Asphalt is currently operating under Plan Approval No. 4P07033 issued by MassDEP on January 28, 2008. In this application (SE-15-011), the facility seeks to increase the production of hot mix asphalt from 200,000 tons per year to 375,000 tons per year and the Hot Mix Asphalt (HMA) plant's annual fuel limits to a maximum of 105 Million Standard Cubic Feet (MMSCF) of natural gas or a maximum of 750,000 gallons of No.2 fuel oil or any combination of the two (2) fuels not to exceed 105,000 MMBtu/year. No.2 fuel oil will have a maximum sulfur content of 0.0015% by weight and is also known as ultra-low sulfur diesel (ULSD) fuel. Monthly production is proposed to increase from 34,000 tons per month to 62,500 tons per month (TPM) and hot mix Asphalt plant's monthly fuel limits to a maximum of 17.5 MMSCF of natural gas or a maximum of 125,000 gallons of ULSD or any combination of the two fuels not to exceed 17,500 MMBtu /Month. Norfolk Asphalt stated in this application (SE-15-011) that it will comply with the hours of operation approved by the Town of Norwood.

As part of this application (SE-15-011), for odor mitigation, Norfolk Asphalt proposed to use an additive (Ecosorb) in the liquid asphalt and install vent condenser(s) on the liquid asphalt storage tank(s). The vent condenser(s) are proposed to reduce asphalt fumes and visible "blue smoke" fumes.

The Permittee has submitted Air Dispersion Modeling demonstrating that permitted emissions from the proposed increase in fuel usage and production of hot mix asphalt will not cause a violation of the National Ambient Air Quality Standards (NAAQS).

The existing Approval (4P07033, dated January 28, 2008) will be superseded by this Approval (SE-15-011).

Best Available Control Technology is defined in Table 2.

2. EMISSION UNIT 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	Hot Asphalt Batch Mix Plant	Stansteel Model RM80 288 tons/hr of hot mix asphalt. Max Heat Rate of 100 MMBtu/hr. Equipped with Gencor Model UF-100 air atomized burner	Gencore 54" primary collector (Knockout box) Gencore CFS-151 (baghouse) 74,092 ACFM 872 Nomex bags Total cloth area= 15,059 Air to cloth ratio = 4.19 to 1
2	Hot Oil Asphalt Tank Heater	Gencor, Model HYC-200 Equipped with a Gencor Model HYC-200 burner Max Heat Rate of 2.0 MMBtu/hr	None

Table 1 Key:

ACFM = actual cubic feet

MMBtu/hr = Million British Thermal Unit per hour

EU = Emission Unit Numbers per minute

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
1	1. Monthly production of hot mix Asphalt shall not exceed 62,500 tons.	All	N/A
	2. Production of hot mix Asphalt shall not exceed 375,000 tons per consecutive 12-month period.		
	3. Monthly usage of both natural gas and No.2 fuel oil shall not exceed 17,500 MMBtu.		
	4. Usage of both natural gas and No.2 fuel oil shall not exceed 105,000 MMBtu per consecutive 12-month period.		
	5. Overall particulate matter control efficiency of the knockout box and baghouse shall be maintained at 99.97%.	PM _{2.5}	0.007gr/dscf
		PM ₁₀	0.01 gr/dscf

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit
1	<u>Natural Gas</u> 6. Monthly Natural Gas usage shall not exceed 17.5 MMSCF. 7. Natural Gas usage shall not exceed 105.0 MMSCF per consecutive 12- month period.	PM	0.29 TPM ^(note1)
			1.75 TPY ^(note1)
		NO _x	0.084 lb/MMBtu
			0.74 TPM ^(note1)
			4.41 TPY ^(note1)
		CO	0.25 lb/MMBtu
			2.19 TPM ^(note1)
			13.13 TPY ^(note1)
		HAP (Total)	0.0076 lb/ton of product
			0.24 TPM ^(note1)
			1.43 TPY ^(note1)
		VOC	0.0082 lb/ton of product
			0.26 TPM ^(note1)
			1.54 TPY ^(note1)
		SO ₂	0.0006 lb/MMBtu
	0.005 TPM ^(note1)		
	0.032 TPY ^(note1)		
	<u>No.2 Fuel Oil</u> 8. Monthly No.2 fuel oil usage shall not exceed 125,000 gallons. 9. No.2 fuel oil usage shall not exceed 750,000 gallons per consecutive 12-month period.	PM	0.30 TPM ^(note2)
			1.80 TPY ^(note2)
		NO _x	0.16 lb/MMBtu
			1.40 TPM ^(note2)
			8.40 TPY ^(note2)
		CO	0.3 lb/MMBtu
			2.63 TPM ^(note2)
15.75TPY ^(note2)			
HAP (Total)		0.0076 lb/ton of product	
		0.24 TPM ^(note2)	
		1.43 TPY ^(note2)	
VOC		0.0082 lb/ton of product	
		0.26 TPM ^(note2)	
		1.54 TPY ^(note2)	

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit
1	10. No.2 fuel oil shall have a maximum sulfur content of 0.0015% by wt (15 ppm).	SO ₂	0.00154 lb/MMBtu
			0.013 TPM ^(note2)
0.081 TPY ^(note2)			
	11. The Permittee shall ensure that the unit is operated so that visible emissions are ≤ 5% opacity.	Opacity	≤ 5% at all times except <10% for < 2 minutes during any one hour period, exclusive of uncombined water vapor
2	12. Monthly usage of both natural gas and No.2 fuel oil shall not exceed 1,500 MMBtu.	All	N/A
	13. Usage of both natural gas and No.2 fuel oil shall not exceed 17,520 MMBtu per consecutive 12-month period.		
	14. Monthly <u>Natural Gas</u> usage shall not exceed 1.49 MMSCF.	PM	0.005 lb/MMBtu
			0.004 TPM ^(note1)
			0.04 TPY ^(note1)
	15. Natural Gas usage shall not exceed 17.52 MMSCF per consecutive 12-month period.	NO _x	0.1 lb/MMBtu
			0.07 TPM ^(note1)
			0.88 TPY ^(note1)
		CO	0.084 lb/MMBtu
			0.06 TPM ^(note1)
			0.74 TPY ^(note1)
		HAP (Total)	0.00019 lb/MMBtu
			0.00014TPM ^(note1)
			0.00166 TPY ^(note1)
		VOC	0.0024 lb/MMBtu
0.002TPM ^(note1)			
0.02 TPY ^(note1)			
	SO ₂	0.0006 lb/MMBtu	
		0.000 TPM ^(note1)	
		0.005 TPY ^(note1)	

Table 2			
EU	Operational / Production Limit	Air Contaminant	Emission Limit
2	<p style="text-align: center;"><u>No. 2 Fuel Oil</u></p> <p>16. Monthly No.2 Fuel oil usage shall not exceed 10,629 gallons.</p> <p>17. No.2 Fuel oil usage shall not exceed 125,143 gallons per consecutive 12-month period.</p> <p>18. No.2 fuel oil shall have a maximum sulfur content of 0.0015% by weight (15 ppm).</p>	PM	0.014 lb/MMBtu
			0.01 TPM ^(note2)
			0.13 TPY ^(note2)
		NOx	0.143 lb/MMBtu
			0.11 TPM ^(note2)
			1.25 TPY ^(note2)
		CO	0.036 lb/MMBtu
			0.03 TPM ^(note2)
			0.31 TPY ^(note2)
		HAP (Total)	0.00019 lb/MMBtu
			0.00014TPM ^(note2)
			0.00166 TPY ^(note2)
		VOC	0.0024 lb/MMBtu
			0.002 TPM ^(note2)
			0.02 TPY ^(note2)
SO ₂	0.00154 lb/MMBtu		
	0.001 TPM ^(note2)		
	0.01 TPY ^(note2)		
Facility-wide	19. The Permittee shall ensure that after loading has been completed, each truck driver shall cover their load of hot asphalt mix before leaving the site.	All	N/A
	20. The Permittee shall only use pre-washed aggregate material.	PM	N/A
	21. The Permittee shall ensure that road ways shall be swept and wetted as necessary to minimize fugitive particulate emissions from truck traffic.		
	22. The Permittee shall ensure that water and/or an environmentally acceptable dust suppressant shall be applied to all paved and unpaved road surfaces at the site, as needed, to minimize fugitive particulate emissions.		

Table 2 Key:

Btu = British Thermal Unit	PM ₁₀ = Particulate Matter less than or equal to 10 microns in diameter
BACT = Best Available Control Technology	ppm = parts per million
CO = Carbon Monoxide	SO ₂ = Sulfur Dioxide
EU = Emission Unit Number	TPM = tons per month
gr/dscf = grains per dry standard cubic feet	TPY = tons per consecutive 12-month period
HAP (total) = total Hazardous Air Pollutants	VOC = Volatile Organic Compounds
lb/MMBtu = pound per Million British Thermal Unit	wt = Weight
MMSCF = Million Standard Cubic Feet	% = Percentage
NO _x = Nitrogen Oxides	< = Less than
N/A = Not Applicable	≤ = Less than or equal to
PM = Particulate Matter, total of PM _{2.5} and PM ₁₀	e.g. = for example

Table 2 Notes

1. For the purpose of this approval, the heat content of Natural gas is 1000 Btu per Cubic Foot.
2. For the purpose of this approval, the heat content of No.2 fuel oil is 140, 000 Btu per gallon.

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	<ol style="list-style-type: none"> 1. The Permittee shall conduct emissions compliance testing to demonstrate compliance with the emission limits contained in Table 2 and the applicable limits contained in 40 CFR 60 Subpart I. 2. The Permittee shall conduct prior to the startup of the operation season, a “Visolite” leak detection test on the baghouse of Unit No. 1. Additional tests shall be performed monthly to locate leaks, bag failures, or problems with the operation of the baghouse, such as excessive stack gas opacity. 3. The Permittee shall monitor the usage of fuel and production of hot mix asphalt to demonstrate compliance with the limits in Table 2.
2	<ol style="list-style-type: none"> 4. The Permittee shall monitor the usage of fuel to demonstrate compliance with the limits in Table 2.
Facility-wide	<ol style="list-style-type: none"> 5. The Permittee shall monitor the usage of (aggregate material, fuel, liquid asphalt, odor mitigation additive (e.g. Ecosorb), etc.) and hot mix asphalt produced. 6. The Permittee shall conduct testing in accordance with requirements and procedures set forth by appropriate EPA reference Test methods, 40 CFR 60 Subpart A and Subpart I, Air Pollution Control Regulations, 310 CMR 7.00, Section 7.13 and this approval.

Table 3	
EU	Monitoring and Testing Requirements
Facility-wide	7. The Permittee shall ensure that at a minimum of once per workday, a designated employee familiar with facility operations and air pollution matters relating to this approval shall conduct an inspection of all air pollution control equipment and related operations and activities (e.g. potential fugitive dust/particulate emissions sources, etc.).
	8. The Permittee shall constantly monitor the inlet and outlet temperature and pressure drop across the baghouse.
	9. The Permittee shall monitor fuel oil purchases such that only fuel oil containing no greater than 0.0015 percent by weight Sulfur is purchased for use in each unit.
	10. The Permittee shall monitor sulfur content of each new shipment of fuel oil received. Sulfur content of the fuel can be demonstrated through fuel analysis. The analysis of sulfur content of the fuel shall be in accordance with the applicable American Society for Testing Materials (ASTM) test methods or any other method approved by the MassDEP and EPA. Fuel sulfur information may be provided by fuel suppliers.
	11. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	12. 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.
	13. At least 30 days prior to emission testing, the Permittee shall submit to MassDEP for approval a stack emission pretest protocol.
	14. Within 45 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.

Table 3 Key:

- | | |
|---|--|
| ASTM = American Society for Testing and Materials | EU = Emission Unit Number |
| CFR = Code of Federal Regulations | MassDEP = Massachusetts Department of Environmental Protection |
| CMR = Code of Massachusetts Regulations | USEPA = United States Environmental Protection Agency |
| EPA = United States Environmental Protection Agency | |

Table 4	
EU	Record Keeping Requirements
1	1. The Permittee shall maintain records documenting the results of the Visolite test.
	2. The Permittee shall maintain records on a monthly and consecutive 12-month period basis of fuel usage and hot mix asphalt product to demonstrate compliance with the limits in Table 2.
2	3. The Permittee shall maintain records on a monthly and consecutive 12-month period basis of fuel usage to demonstrate compliance with the limits in Table 2.

Table 4

EU	Record Keeping Requirements
Facility-wide	4. The Permittee shall maintain records documenting the use of the proposed odor mitigation additive (e.g. Ecosorb) to ensure that it is used in accordance with manufacturer’s guidelines.
	5. The Permittee shall maintain a copy of the manufacturer’s guideline for the odor mitigation additive (e.g. Ecosorb) and vent condenser(s) proposed herein on-site.
	6. The Permittee shall establish and maintain a recordkeeping log that shall, at a minimum, include a report of conditions noted at inspections conducted by the facility designated observer and any corrective actions taken. The report shall also note the date, time, equipment, and activities observed.
	7. The Permittee shall establish and maintain a recordkeeping log at least once a day during operation that shall include a report of the inlet and outlet temperature and pressure drop across the baghouse to ensure that the baghouse is operating according to manufacturer specifications.
	8. The Permittee shall maintain oil analysis results used to demonstrate compliance with fuel oil sulfur content requirements.
	9. 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 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 15 th 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/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping .
	10. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	11. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s), Pollution Control Devices approved herein on-site.
	12. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	13. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), Pollution Control Devices 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.
	14. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	15. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.

Table 4	
EU	Record Keeping Requirements
Facility-wide	16. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

CMR = Code of Massachusetts Regulations
 EU = Emission Unit Number

PCD = Pollution Control Device
 SOMP = Standard Operating and Maintenance Procedure

EU(s) = Emission Unit (s)

USEPA = United States Environmental Protection Agency

Table 5	
EU	Reporting Requirements
1	1. The Permittee shall maintain baghouse maintenance reports. Each report shall specify the dates of the Visolite tests, the number and location of filter elements replaced, the overall condition of the bag house, the date the unit was inspected, and the date the work was completed.
Facility-wide	2. 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).
	3. The Permittee shall notify the Southeast Regional Office of MassDEP, BAW Compliance & Enforcement (C/E) Chief by telephone:508-946-2817, email: sero.air@state.ma.us , or fax :(508)-947-6557, 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 C/E 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).
	4. The Permittee shall report 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.

Table 5 Key:

BAW = Bureau of Air and Waste
 CMR = Code of Massachusetts Regulations
 C/E = Compliance and Enforcement

EU = Emission Unit Number
 MassDEP = Massachusetts Department of environmental Protection

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:

Table 6	
EU	Special Terms and Conditions
Facility-wide	1. The Permittee shall provide lighting sufficient to accommodate routine night maintenance of all air pollution control equipment.
	2. The Permittee shall minimize dust, odor and / or noise impacts from the facility through standard operating and maintenance procedures. These procedures include preventative and/or mitigation measures, such as but not limited to, construction of earthen berms, sound attenuation devices/measures, periodic sweeping / cleaning / washing / wetting of truck / vehicle traffic and equipment operational areas, including raw material and/or finished product storage and / or transfer areas, etc. with water (or other environmentally acceptable dust suppressant) spray. Trucks, vehicles, and/or equipment used at the facility shall be operated in a manner that minimizes the generation of fugitive emissions. Trucks used for the transport of raw materials and/or asphalt product shall be covered upon entering and exiting the facility. The Department reserves the future right to require additional dust, odor, and/or noise minimization measures to be implemented, if deemed necessary. Any and all actions necessary (including shutdown) to abate a condition of air pollution due to the emission of odor, dust, or noise from the facility shall be taken if such a condition exists.
	3. The Permittee shall ensure that all liquid asphalt storage tank(s) are equipped with vent condenser(s).The vent condenser(s) shall be operated and maintained according to manufacturer’s guidelines.
	4. The Permittee shall limit the hours of operation as follows: a. Monday through Friday (6:30am to 4:30pm) b. Saturdays (6:30am to 12:00pm) (This provision does not intend to conflict with the authority of the Town of Norwood to establish hours of operation for the facility.)
	5. The Permittee shall use the odor mitigation additive (e.g. Ecosorb) it proposed as Best Available Control Technology (BACT), according to manufacturer’s guidelines.
	6. The facility approved in this approval letter shall be operated in accordance with all limits and/or restrictions (fuel, emissions, operational, production, etc.) contained in this approval letter. In addition, the facility shall be operated in strict accordance with the conditions, provisions and/or descriptions contained in this Conditional Approval, which include, but are not limited to: standard operating and maintenance procedures, preventative/mitigation measures for air pollution, recordkeeping, reporting, notifications, testing requirements, etc.
	7. Contaminated soil shall not be processed at this facility.

Table 6	
EU	Special Terms and Conditions
	8. This Plan Approval, Transmittal No. X263804 supersedes the Conditional Plan Approval Transmittal No. W150764 issued to the Permittee on January 28, 2008.

Table 6 Key:

EU = Emission Unit Number

No. = 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 configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including, but not limited to, rain protection devices known as “shanty caps” and “egg beaters.”
- 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 (inches)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1	36	57.75× 38.38	40.8-75.1	240-300
2	11.5	1.11	11.7	400

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. 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 the undersigned by telephone at 508-946-2824, 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.

Thomas Cushing
Permit Chief
Bureau of Air and Waste

Enclosure

ecc: Norwood Board of Health
Norwood Fire Department
MassDEP/Boston - Yi Tian
MassDEP/SERO - Maria Pinaud

ETG/ Engineering Technology Group, Inc. - Max Scholl