



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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September 29, 2011

Mr. Bruce Wooley
Manager of Environmental R&D and Safety
Interprint, Inc.
101 Central Berkshire Blvd.
Pittsfield, MA 01201

Re: BAPCD – Pittsfield
310 CMR 7.02
Appl. # 1-P-11-008; Trans. # X235610
Facility BACT/LAER Determination

Final Approval

Dear Mr. Wooley:

The Department of Environmental Protection, Western Regional Office ("MassDEP") received on April 12, 2011 a Non-Major Comprehensive Plan Application from Interprint, Inc., 101 Central Berkshire Blvd., Pittsfield, MA 01201 ("Interprint") proposing a facility-wide volatile organic compound ("VOC") emission rate equivalent to *Best Available Control Technology* ("BACT") and *Lowest Achievable Emission Rate* ("LAER"). The Application also proposes a facility-wide annual mass emission restriction for VOC, total hazardous air pollutants ("HAP"), and for single HAPs. BACT is also determined for the other air emitting sources at the facility. The application bears the seal and signature of James R. Heckathorne, Massachusetts Registered Professional Engineer No. 39271.

Background

The Plan Application was submitted to MassDEP on April 12, 2011 pursuant to Section V (Compliance Requirements) of the Consent Decree negotiated between Interprint and the United States of America (Case 3:10-cv-30223). Interprint was required to submit an application for plan approval to the MassDEP within 30 days of the approval of the draft application (March 22, 2011) by the U.S. Environmental Protection Agency (USEPA).

The Consent Decree was issued as resolution of the USEPA complaint that Interprint constructed and operated a new printing facility in Pittsfield, Massachusetts, without securing a nonattainment New Source Review permit for emissions of VOCs, and that Interprint violated requirements of the Air Quality Title V regulations and the National

Emission Standards for Hazardous Air Pollutants for Printing and Publishing Facilities regulations.

The Consent Decree required, in part, that Interprint comply with 310 CMR 7.00 (the Code of Massachusetts Regulations; Title 310; Chapter 7.00) Appendix A (10)(a)(2), Appendix A(4)(b), and Appendix A(6), and 310 CMR 7.02 – Plan Approval, and with the National Emission Standards for Hazardous Air Pollutants for Printing and Publishing Facilities (40 C.F.R. Part 63, Subpart KK).

Review of the application by MassDEP reveals the following:

Introduction

Interprint designs and prints decorative paper used as the design layer in laminate surfaces such as countertops, flooring, furniture, and store fixtures. Interprint operates three primary sources of VOC emissions at their facility, as follows:

- 1. Five (5) Production Printing Presses, and**
- 2. Three (3) Lab Printing Presses.**

The Consent Decree established VOC emission limits for the five (5) production rotogravure printing presses and the three (3) lab rotogravure printing presses as follows:

- A limitation on the VOC content of the existing inks – See the Coating List in the Appendix of this Final Approval;
- A process to determine LAER on any new inks – If Interprint introduces new inks into their process, these inks will have to be evaluated in accordance with the steps outlined in the provisions of the Consent Decree (replicated in this Final Approval) to ensure they meet the requirement of LAER equivalency; and
- A yearly mass emission limitation – 49.0 tons per year (tpy) VOC, 24.5 tpy total HAP, and 9.8 tpy single HAP (replicated in this Final Approval).

- 3. Laminating process for product development and QA/QC purposes.**

The Consent Decree established VOC emission limits for the laminating process as follows:

- A production limit of the number of laminates (replicated in this Final Approval) produced during all rolling 12-month periods.

Other secondary air pollution sources at Interprint are as follows:

- 4. Pigment Wastewater Treatment Process;**
- 5. Emergency Engine/Generator (33 kW);**
- 6. Miscellaneous Combustion Units;**
- 7. Corona Treater;**
- 8. Hard Chromium Electroplating Process;**
- 9. Zinc Electroplating Process; and**
- 10. Engraving Process.**

1. Production Printing Presses

Interprint operates five (5) production rotogravure printing presses for production purposes using water-based inks. The production printing presses are subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry).

The printing lines are equipped with drying ovens that are heated with propane at a maximum heat input capacity of 3.2 to 13 million British thermal units per hour (MMBtu/hr). Emissions from each of the production printing presses vent to two emission points.

Specifications for the production printing presses are depicted in Table 1 below:

Table 1
Specifications of Production Printing Presses

Press ID#	Manufacturer/Model	Maximum Web Width	# of print stations	Maximum Production Rate (Square Meter/Minute)
Production Press M-1	Kochsiek/502	5 feet	4	24,000
Production Press M-2	Kochsiek/502D	5 feet	4	28,800
Production Press M-3	Kochsiek/502D	5 feet	4	28,800
Production Press M-4	Kochsiek/4153	7 feet	5	49,140
Production Press M-6	Kochsiek/4153	8 feet	4	73,710

The actual emission of VOC from these production printing presses in 2008 was 15.7 tpy and in 2009 was 7.6 tpy. The conformance to the requirements of 40 CFR Part 63; Subpart KK, the proposed restrictions of VOC, total HAP, and single HAP (diethanolamine, glycol ethers, and ethylene glycol) emissions, and meeting the ink/coating VOC requirements in Appendix A of this Final Approval meets the MassDEP requirements for BACT and LAER as stipulated in the "Regulations".

2. Lab Printing Presses

Interprint operates three (3) lab rotogravure printing presses that are used to perform design development of decorative prints and are infrequently used for production purposes. The lab printing presses are used to produce approximately 0.1% of the printed product made at the facility and are otherwise used to conduct research into new products. As a result, the lab printing presses are considered to qualify as research and laboratory equipment. Subpart KK does not apply to research or laboratory equipment [63.820(b)], which is defined as:

Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Since the lab printing presses are used to make only a de minimis amount of product for sale, the three lab printing presses meet the definition of research or laboratory equipment and are not subject to Subpart KK.

Lab Presses L-1 and L-2 are equipped with drying ovens that are heated by a propane-fired hot oil system with a maximum 1.5 MMBtu/hr heat input rating. Lab Press L-3 is equipped with drying ovens that are heated with propane at a maximum heat input capacity of 1.3 MMBtu/hr. Each lab printing press vents to its own stack.

Specifications for the lab printing presses are depicted in Table 2 below.

Table 2
Specifications of Lab Printing Presses

Press ID#	Manufacturer/Model	Maximum Web Width	# of print stations	Maximum Production Rate (Square Meter/Minute)
Lab Press L-1	Kochsiek/85	2 feet	4	3,600
Lab Press L-2	Kochsiek/88	2 feet	4	3,600
Lab Press L-3	Giave/5E-700	2 feet	4	5,760

The actual emission of VOC from the lab printing presses in 2008 was 4.1 tpy and in 2009 was 0.2 tpy. The proposed restrictions of VOC, total HAP, and single HAP (diethanolamine, glycol ethers, and ethylene glycol) emissions and meeting the ink/coating VOC requirements in Appendix A of this Final Approval meets the MassDEP requirements for BACT and LAER as stipulated in the "Regulations".

3. Laminating Process

In the laminating process, samples of printed paper are laminated as part of the quality control process to check the color and design of customers' final products. The size of the typical printed sample ranges from 12 inch (in.) by 12 in. to 20 in. by 20 in. Individual samples of printed paper are laminated in a non-continuous, batch process.

Process equipment located in the Laminating Room is specified in Table 3 below.

Table 3
Specifications of Laminating Presses and Drying Ovens

QA/QC Laminating Process	Equipment Description
Laminating Press #1 (LP1)	High Pressure Press
Laminating Press #2 (LP2)	High Pressure Press
Laminating Press #3 (LP3)	High Pressure Press
Laminating Press #6 (LP6)	High Pressure Press
Laminating Press #4 (LP4)	Low Pressure Press
Laminating Press #5 (LP5)	Low Pressure Press
Drying Oven #1 (DO1)	Drying Oven
Drying Oven #2 (DO2)	Horizontal Drying Oven
Drying Oven #3 (DO3)	Horizontal Drying Oven

Based on recent stack testing, total potential VOC emissions from the Laminating Room are approximately 0.9 tpy, with HAP emissions being < 0.1 tpy.

BACT and LAER for the Laminating Room is being proposed as a production limit of the number of laminates produced during all rolling 12-month periods that will limit VOC emissions to less than one tpy. These low levels of VOC emissions (< 1 tpy) meets the MassDEP requirements for BACT and LAER as stipulated in the "Regulations".

4. Pigment Wastewater Treatment Process

The lab and production printing press equipment is cleaned with water at the end of each order. The resulting wash water and ink residual is pumped to overhead piping and gravity conveyed to the pigment wastewater treatment system. Collected wash water is treated approximately once per day in an open 1,200-gallon tank. The treatment process involves the addition of sulfuric acid, coagulant, and flocculent. The treated wash water then is filtered through a frame and plate filter. The filtrate is discharged to the local publicly owned treatment works (POTW), and the solids are temporarily stored in roll-off containers and disposed off site as a non-hazardous waste.

Because the VOCs contained in the wash water are water soluble compounds with very low vapor pressures (i.e., ranging from less than 0.01 to 0.4 millimeters of mercury), the potential VOC emissions resulting from this wastewater treatment process are approximately 0.7 tpy. These low levels of VOC (< 1 tpy) meets the MassDEP requirements of BACT and LAER as stipulated in the "Regulations".

5. Emergency Engine/Generator (33 kW)

The emergency engine/generator is rated at 33 kW output (approximately 0.5 MMBtu/hr heat input rate burning propane) and has the potential to emit approximately 0.02 tpy of VOC. The emergency engine/generator was purchased in 2001 and installed in 2004. It is subject to the requirements of 310 CMR 7.03(10)(b), which requires the use of fuel meeting the applicable EPA sulfur limits pursuant to 40 CFR 80.29, 40 CFR 80.5, and 40 CFR 80.520(a) and (b) as in effect January 18, 2001. It is also subject to Section 63.6590(c) of 40 CFR Part 63; Subpart ZZZZ which requires, in part, that a non-resettable hour meter be installed on an existing emergency engine located at an area source of HAP by the compliance date of October 19, 2013, and that the engine be operated and maintained according to the manufacturer's emission-related written instructions.

The use of propane in this emergency engine, the low levels of VOC emissions (<1 tpy), and operating in accordance with any applicable requirements of 40 CFR Part 63; Subpart ZZZZ meets the MassDEP requirements of BACT and LAER as stipulated in the "Regulations".

6. Miscellaneous Combustion Units.

Interprint relies on propane units for heat in the printing process and engraving process. Process heater potential VOC emissions are approximately 0.8 tpy.

In addition, propane heaters are used for comfort heating in the production areas and offices. Comfort heating potential VOC emissions are approximately 0.3 tpy.

The existing combustion equipment operation meets the MassDEP requirements of BACT and LAER through the use of propane as fuel. Additionally, any fuel burning equipment \geq 3 MMBtu/hr heat input will be subject to the requirements of 310 CMR 7.04(4)(a) Inspection, Maintenance and Testing.

The use of propane as a fuel, meeting the requirements of 310 CMR 7.04(4)(a), and meeting a low level of VOC emissions (< 1 tpy) meets the MassDEP requirements of BACT and LAER as stipulated in the "Regulations".

7. Corona Treater

The Corona Treater is manufactured by Enercon Industries Corporation and is installed on Production Printing Press #3. Its purpose is to remove oils from a film substrate, increasing surface tension of the substrate and enhancing the adhesion of inks.

The air flow through the corona treater will be vented to a catalytic ozone decomposer that will reduce an input ozone level of up to 150 ppm to less than 0.1 ppm

The Corona Treater is subject to the requirements of 310 CMR 7.03(21). It has potential emissions of ozone of approximately 10 pounds per year. Accordingly, it meets the MassDEP equivalent of BACT as stipulated in the "Regulations".

8. Hard Chromium Electroplating Process

The hard chromium electroplating process is subject to the regulations at 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks). Meeting these emission standards meets the MassDEP requirements of BACT as stipulated in the "Regulations".

9. Zinc Electroplating Process

Zinc electroplating involves a 119 gallon zinc dissolving tank, a 845 gallon zinc electroplating tank, and a 16 gallon Carbolux tank. Each of these tanks is equipped with a cover that fully encloses the bath. Solution from the dissolving tank is fed automatically via plastic tubing to the electroplating tanks to maintain the zinc level at a concentration of 30 grams per liter. The composition of the two zinc tanks is the same with the exception of the concentration of zinc. The purpose of the Carbolux tank is to precipitate the excess sodium carbonate from the zinc plating solution.

For the zinc electroplating process, sodium hydroxide emissions, in the form of condensable particulate matter, are estimated at less than 750 pounds per year. These low levels of particulate matter emissions (< 1 tpy) meets the MassDEP requirements of BACT as stipulated in the "Regulations".

10. Engraving Process

The laser engraving process involves the use of a laser to engrave rotogravure cylinders that have been plated with a layer of zinc. Particulate matter emissions generated by the laser engraver will be vented to a filter cartridge, carbon filter, and an aerosol filter.

For the engraving process, particulate matter emissions are estimated at less than 850 pounds per year before control and less than 1 pound per year after control. These low levels of particulate matter emissions (< 1 tpy) meets the MassDEP requirements of BACT as stipulated in the "Regulations".

Emission Tracking

Interprint tracks material use and VOC/HAP emissions for the production and lab presses by uploading physical inventory data related to ink materials and ink additives into a computer system on a monthly basis, thereby providing a snapshot in time of the quantities of materials available for use. At the end of each month, a calculation is performed by the program comparing the sum of the previously recorded physical inventory data and the received materials against the newly uploaded physical inventory data. The difference in these two values is reported as the monthly ink consumption.

Emissions calculations as stated above assume 100% consumption of the materials recorded in the physical inventory data. In reality, Interprint is able to recycle and reuse return inks from each job run and, therefore, regularly overstates actual emissions.

Monthly VOC emissions from the laminating process are tracked by recording the number of laminates made each day, summing the number of laminates made at the end of the month, and applying the VOC emission factor derived from source testing (0.0022 lb/laminate). Monthly HAP emissions are tracked in a similar way using HAP emission factors derived from source testing (e.g., 0.0021 lb total HAP/laminate).

PROVISIONS OF APPROVAL

It is the opinion of MassDEP that the operation of the VOC/HAP emitting equipment and the other criteria pollutant emitting equipment at Interprint, Inc., 101 Central Berkshire Blvd. in Pittsfield, Massachusetts is consistent with modern air pollution control technology, BACT, and LAER. The MassDEP hereby issues approval for the equipment and operation described herein and in the submittal pursuant to 310 CMR 7.02(5) of the "Regulations for the Control of Air Pollution in the Berkshire Air Pollution Control District", subject to the following provisions:

1. Interprint shall ensure that the facility operates in accordance with the requirements specified in Table 1:

Table 1				
EU#	Raw Material	Restrictions	Pollutant	Emission Limit/Standards
Production Press M-1 Production Press M-2 Production Press M-3 Production Press M-4 Production Press M-5	coatings/inks, paper, and film	49.0 tpy ⁽¹⁾ ----- 24.5 tpy total HAP ⁽¹⁾ 9.8 tpy single HAP ⁽¹⁾	VOC ----- HAP	Use inks with VOC content no greater than specified in the Coating List in the Appendix of this Final Approval. See Provision 2.
Lab Press L-1 Lab Press L-2 Lab Press L-3	coatings/inks, paper, and film	See Provision 3.c.	VOC/HAP	Use inks with VOC content no greater than specified in the Coating List in the Appendix of this Final Approval. See Provision 3.
Laminating Room	liquid resin, phenolic core paper, and melamine overlay	202,176 laminates per year ⁽²⁾ See Provision 4.	VOC/HAP	
Facility- Wide	any	49.0 tpy ⁽¹⁾ ----- 24.5 tpy total HAP ⁽¹⁾ 9.8 tpy single HAP ⁽¹⁾	VOC ----- HAP	

Notes for Table 1:

- (1) tpy (tons per year) refers to tons emitted, based on a rolling 12-month total. Compliance with a 12-month rolling total is determined *each month (12 times per year)* by adding the previous 12 months of emissions and comparing the total to the limit specified above.
- (2) total laminates produced, based on a rolling 12-month total. Compliance with a 12-month rolling total is determined *each month (12 times per year)* by adding the previous 12 months of emissions and comparing the total to the limit specified above.

2. Interprint shall limit VOC emissions from Production Presses M-1, M-2, M-3, M-4, and M-6 as follows during all periods of operation.
 - a. Interprint shall use coatings with VOC contents no greater than the contents listed in the Coatings List in the Appendix of this Final Approval.
 - b. If Interprint uses a new coating to replace an existing coating on the Coatings List, the new coating will have a VOC content no greater than the coating it is replacing.
 - c. If Interprint develops a new type of coating that does not replace an existing coating, and that has a higher VOC content than its existing coatings on the Coatings List, it will evaluate this new coating (e.g., using its lab printing presses) to document that it has developed the coating with the lowest VOC content possible. Interprint shall document this process through trial reports and other relevant records, and keep such records on-site and available for inspection.

3. Interprint shall limit VOC emissions from Lab Presses L-1, L-2, and L-3 as follows during all periods of operation.
 - a. In the development of new designs, Interprint shall use coatings with VOC contents no greater than the contents listed in the Coatings List in the Appendix of this Final Approval. If Interprint uses a new coating to replace

an existing coating, the new coating will have a VOC content no greater than the coating it is replacing.

- b. In processing limited production orders Interprint shall use coatings with VOC contents no greater than the contents listed in the Coatings List. If Interprint uses a new coating to replace an existing coating on the Coatings List, the new coating will have a VOC content no greater than the coating it is replacing.
- c. If, for purposes of new product development, Interprint develops a new type of coating that does not replace an existing coating on the Coatings List, and that has a higher VOC content than any of its existing coatings on the Coatings List, Interprint shall evaluate such a coating on its lab printing presses and limit emissions from the lab printing presses to the following rates over an 8-hour averaging period.
 - i. Lab Press L-1 will be limited to 5.3 lb/hr
 - ii. Lab Press L-2 will be limited to 5.3 lb/hr
 - iii. Lab Press L-3 will be limited to 8.5 lb/hr

After conducting such a coating development process but before commencing production using a new coating, Interprint shall document that it has developed a coating with the lowest VOC content possible. Interprint shall document this process through its trial reports and other relevant records, and keep these records on-site and available for review. In the event that Interprint's actual annual emissions for any new product development will exceed one ton VOCs per year, Interprint shall submit a permit application to MassDEP in accordance with 310 CMR 7.02.

- 4. Interprint shall limit emissions from the Laminating Room by producing no more than 202,176 laminates (ranging from 12 x 12 inches to 20 x 20 inches) per year, based on a rolling 12-month total.
- 5. Interprint shall ensure that all production and lab printing press dryers and all comfort heating units with an individual heat input capacity of ≥ 3 MMBtu/hr comply with the requirements of 310 CMR 7.04(4)(a) Inspection, Maintenance and Testing.
- 6. Interprint shall operate the emergency engine/generator in accordance with the requirements of 310 CMR 7.02(2)(b)(8) and in accordance with the provisions of 40 CFR Part 63; Subpart ZZZZ. These requirements are effective October 19, 2013.
- 7. Interprint shall operate the Corona Treater in accordance with the requirements of 310 CMR 7.03(21).

8. Interprint shall track on a calendar month basis the use of all VOC and HAP such that compliance with all of the emission limits specified in this Final Approval can be determined.
9. Interprint shall monitor and keep records on a calendar month basis for the Production Presses (M-1, M-2, M-3, M-4, and M-6 collectively) and the Lab Presses (L-1, L-2, and L-3 collectively):
 - a. The type of coatings used in the Production Presses (M-1, M-2, M-3, M-4, and M-6 collectively) and the Lab Presses (L-1, L-2, and L-3 collectively);
 - b. Pounds of each coating applied;
 - c. The VOC and HAP content of the coatings used; and
 - d. The pounds of VOC and HAP emitted by the Production Presses (M-1, M-2, M-3, M-4, and M-6 collectively) and the Lab Presses (L-1, L-2, and L-3 collectively).
10. Interprint shall monitor and keep records on a calendar month basis, the total pounds of VOC and HAP emitted from the entire facility.
11. Interprint shall, on a daily basis, monitor and keep records of the number of laminates produced from the Laminating Room . The total number of laminates produced each month will be summed from the daily records, and recorded to track the 12-month rolling total of laminates produced.
12. Interprint shall generate monthly reports in-house, by the 15th day of the following month, that document compliance with the rolling 12-month total emission limits and production limits specified in this Final Approval.
13. Interprint shall 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, covering facility-wide compliance with 310 CMR 7.00.

Submittal of reports to MassDEP made in accordance with 310 CMR 7.00 (10) "*Recordkeeping and Reporting Requirements.*" of the Air Quality "*Operating Permit and Compliance Program*" shall satisfy the requirements of this provision. The submission of a separate set of reports is not required to satisfy the requirements of this Final Approval.

Permit Deviation

14. Interprint shall report to the MassDEP all instances of deviations¹ from permit requirements.

15. Interprint shall report to the MassDEP 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 herein or in 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, this Final Approval, or other approvals.
 - Failure to perform QA/QC measures as required by this Final Approval 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 compliance summary specified in Provision 13 of this Final Approval.

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.

For 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 compliance summaries.

¹ Deviations are instances where any permit condition is violated and not reported as an emergency as described in this Final Approval in the section "Emergency Conditions". Reporting a permit deviation is not an affirmative defense for action brought for noncompliance.

Emergency Conditions

16. Interprint shall be shielded from enforcement action brought for noncompliance with technology based² emission limitations specified herein as a result of an emergency³. In order to use emergency as an affirmative defense to an action brought for noncompliance, Interprint shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. an emergency occurred and that Interprint 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, Interprint 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. Interprint 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.

² 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.

³ 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.

GENERAL CONDITIONS OF APPROVAL

1. Interprint shall allow authorized MassDEP representatives immediate access to the facility in order to take samples, view the process operation or examine records to verify compliance.
2. This Final Approval may be suspended, modified, or revoked by MassDEP if, at anytime, MassDEP determines that any condition or part of this Final Approval is being violated. MassDEP shall be notified in writing prior to any modification of the facility such as a change in raw materials or an increase in production capacity that may increase emissions.
3. Interprint shall operate a facility constructed, substantially reconstructed, or altered pursuant to 310 CMR 7.02 except in conformance with the requirements established therein and in conformance with the specific written plan approval requirements.
4. Reporting – Any construction, substantial reconstruction or alteration, as described in 310 CMR 7.02, at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to MassDEP on the next required source registration.
5. Interprint shall ensure that noise from the facility during construction, initial startup and routine operation, including startups and shutdowns, shall not exceed MassDEP noise guidelines and shall not cause a condition of air pollution as defined in 310 CMR 7.01 and 7.10.
6. Interprint shall ensure the facility is operated in a manner to minimize the occurrence of dust or odor conditions which cause or contribute to a condition of air pollution as defined in 310 CMR 7.01 and 7.09.
7. Interprint shall operate the facility in a manner to minimize the occurrence of visible emissions, which cause or contribute to a condition of air pollution as defined in 310 CMR 7.01 and 7.06.
8. This Final Approval does not negate the responsibility of owner/ operator of the referenced facility to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this Final Approval imply compliance with any other applicable federal, state or local regulation now or in the future.
9. Should asbestos remediation/removal be required as a result of the approved construction/reconstruction/alteration of this facility, such asbestos remediation / removal shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.

This Final Approval consists of the application materials and this Final Approval letter. If conflicting information is found between these two documents, then the requirements of this Final Approval letter shall take precedence over the documentation in the application materials.

MassDEP has determined that the filing of an Environmental Notification Form (“ENF”) with the Secretary of Environmental Affairs, for air quality purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act and Regulation 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 Environmental Impact Report at a later time.

APPEAL RIGHTS

This Final 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 Final 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 Final 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) must be mailed to:

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.

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.

If you have any questions concerning this Final Approval, please feel free to contact John Kirzec at (413) 755-2225.

Sincerely,

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
Interprint NM 2011-09-29 FINAL.doc

Certified Mail: 7009 0960 0000 6505 8445

ecc: Yi Tian, MassDEP, Boston
Roberta Baker, MassDEP, WERO
Peter Czapienski, MassDEP, WERO

Sansevero.Christine@epamail.epa.gov
olivier.tom@epamail.epa.gov
Cris.Hine@obg.com

Appendix Coating List (9/29/2011)

Coating Identification	Coating Percent VOC
Ex -1	0.91%
Ex-2	0.18%
Ex-3	0.18%
Ex-4	1.56%
YI-1	0.79%
On -2	0.95%
Re -1	0.67%
Re-2	0.98%
Be -1	1.16%
BI-1	4.90%
BI-2	1.30%
BI-3	1.30%
BI-4	1.30%
Wt-1	1.80%
Wt-2	0.30%
Wt-3	0.47%
Wt-4	0.53%
YI-2	0.53%
Re-3	1.50%
Ex-5	1.81%
Ex-6	3.48%
Pe -1	1.80%
Pe-2	1.00%
Pe- 3	1.00%
Pe-4	1.80%
Pe-5	1.70%
Pe-6	2.10%
Pe-7	1.80%
Pr -1	0.10%
Pr- 2	0.10%
Sb-1	43.80%
Cl-1	50.00%
Df-1	0.00%
Gw-1	0.00%
PI-1	1.80%
PI-5	0.06%
PI-2	0.60%
PI-6	1.00%
PI- 3	1.40%
PI-7	0.06%
PI-4	3.50%
PI- 8	0.04%