Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 150 Presidential Way Woburn, MA 01801 • 978-694-3200

September 12, 2024

Mr. Jeffrey Allen
The Gillette Company, LLC
30 Burtt Road
Andover, MA 01810

RE: **ANDOVER**
ePlace Authorization No.: AQ02P-0000073
Application No.: 23-AQ02P-0014-APP
Approval No.: NE-23-016
Class: SM79-7
FMF No.: 130128
FINAL AIR QUALITY PLAN APPROVAL

Dear Mr. Allen:

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 construction and operation of a new perforating press that will be used in blade perforating operations, new quality assurance / quality control cleaning of injection molding equipment, and various new blade treatment and razors manufacturing operations at your facility located at 30 Burtt Road in Andover, Massachusetts ("Facility"). The Application bears the seal and signature of Mr. A.J. Jablonowski, Massachusetts Registered Professional Engineer Number 39123.

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-O, 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.

On June 5, 2024 public notice was published on the MassDEP website in English for public review and comment on the proposed Non-Major Plan Approval (ePlace Application No. 23-AQ02P-0014-APP) for your facility located at 30 Burtt Road in Andover, MA. The comment period ended July 5, 2024.

Comments were received. They are summarized in the attached Response to Comments.

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

A. FACILITY DESCRIPTION

The Gillette Company Andover Manufacturing Center ("Permittee" or "AMC") manufactures shaving products, including shaving cream and shaving gel, at 30 Burtt Road in Andover. The Permittee currently operates under Plan Approval NE-21-024, issued on March 22, 2022.

The current Plan Approval NE-21-024 consists of the following existing Emission Units (EU):

Three aerosol can filling lines: EU5 and EU17, which emit volatile organic compounds (VOC).

The Tank Farm: EU12 which consists of three propellant tanks (A46, Blowing Agent, and one spare tank).

Four Stationary Reciprocating Internal Combustion Engines (RICE) engines: EU13, EU14, EU23, and EU24 that may be subject to the Federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) under 40 CFR Part 63 Subpart ZZZZ.

Two natural gas-fired boilers: EU1 and EU3 capable of burning 29.291 million British thermal units (MMBtu) per hour each.

The remaining emission units in the facility include: EU10, a pilot lab for testing propellants and concentrates; EU19, the facility date coding operation which prints a date on the finished product manufactured at the facility; EU25, miscellaneous VOC emissions from venting, repairs, etc. from gas rooms associated with production lines; ethanol usage for sanitizing key surfaces at many different locations of the facility.

In addition, a shave gel manufacturing line, Line 4, existed at the Facility and that had previously been approved as EU7. Said approval included VOC propellant emission and operational limits and monitoring and record-keeping requirements. Subsequently, MassDEP issued Approval Number MBR-09-IND-011, requiring that the VOC propellant injection lines be physically removed. Since Line 4 no longer utilizes VOC propellant, there are zero VOC emissions and, therefore, said Line is not contained herein.

B. PROJECT DESCRIPTION

The Permittee is proposing to install three new emission units related to blades and razors manufacturing operations, as described below.

EU27 will emit VOC and Particulate Matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$) from perforation press lubricating oil that will be used in the operations of three blade perforation press machines.

The perforation press lubricating oil is a light oil with relatively low vapor pressure which is thinly sprayed onto the metal blade strips within the mechanical metal perforation press. Emissions from the perforation press lubricating oil will have properties of both an oil mist, which will be tracked as $PM_{2.5,}$ and evaporative VOC emissions. The Permittee is proposing 5.98 tons per consecutive twelve-month period of VOC and 5.98 tons per consecutive twelve-month period of $PM_{2.5}$ based on raw material use and material balance. The Permittee has proposed to track perforation press lubricating oil that is not used and recovered on site. The proposed operations from EU27 will utilize two identical exhaust stacks with 2,000 actual cubic feet per minute (acfm) flow each.

EU28 will emit VOC emissions from isopropanol used in quality assurance / quality control (QA/QC) cleaning of injection molding equipment. Products such as razors will be manufactured using high-precision injection molding. The Permittee will do the majority of the injection molding equipment cleaning mechanically with dry ice in manufacturing operations, then will use isopropanol as a final cleaning step for QA/QC. In periodic mold quality maintenance, the molds will be first cleaned with ultrasonic cleaning using an alkaline bath, followed by a final hand cleaning using isopropanol. The isopropanol will be mostly stored in squeeze and spray bottles in multiple locations of the facility and will be primarily applied onto hand wipes for use in hand cleaning of molds and related equipment. The potential to emit will be based on isopropanol use and the Permittee is proposing 1.04 tons per consecutive twelve-month period of VOC emissions. The proposed operations from EU28 will utilize two Nederman arms combined into a single stack, with an expected flow of 1,300 acfm, along with exhaust from multiple pickup points in the mold shop.

EU29 will consist of one razor lubricating material extrusion machine, one blade washer, three blade sharpening lines, one blade sharpening oil filtration system, one blade final quality treatment operation 1, and one blade final quality treatment operation 2.

These operations will emit small amounts of lubricating oil mist droplets, small amounts of VOC and $PM_{2.5}$ from various blade treatments, and small amounts of VOC from application of a razor lubricating material. The Permittee is proposing 0.6 tons per consecutive twelve-month period of VOC and 1.12 tons per consecutive twelve-month period of $PM_{2.5}$ for these operations. The various processes comprised by EU29 will occur in different locations around the facility and there will be both stack and fugitive emissions associated with these processes.

The Permittee has also indicated that some equipment will be part of the proposed project but will not be included as emission units in this plan application because they are exempt from permitting. The proposed exempted equipment include: eight plastic injection molding, exempt under 310 CMR 7.02(2)(b)19; one three-cell cooling tower, exempt under 310 CMR 7.02(2)6; and two QA/QC Lab hoods, exempt under 310 CMR 7.02(2)(b)16.

The Permittee is also proposing to install two diesel fire pumps and one diesel emergency engine which will not be considered emission units as part of this plan application but will be subject to Environmental Results Program (ERP) certification under 310 CMR 7.26(42).

All emissions related to these exempt sources as well as any insignificant sources will be included in the Facility-wide emission limits as shown on Table 2 below.

Furthermore, the Permittee states that both the existing EU26 and the new EU28 operations are exempt from Reasonably Available Control Technology (RACT) requirements under 310 CMR 7.18(31)(b)(1)d.iv: cleaning conducted as part of quality assurance / quality control cleaning activities in manufacturing processes.

C. REGULATORY REQUIREMENTS

1. State Requirements

Best Available Control Technology (BACT)

MassDEP has determined that the emission limits in Table 2 below are considered BACT for the proposed equipment.

The Permittee shall comply with the operational requirements in 310 CMR 7.26 (42)(d), the certification requirement in 7.26 (42)(e)1, and the recordkeeping requirements in 7.26(42)(f).

The Permittee has indicated that, although the facility uses industrial cleaning solvents, it is not associated with any specific operations or emission units proposed in this plan application. 310 CMR 7.18(31) shall not apply as the Permittee intends to emit less than three tons of VOC per rolling 12-month period from the usage of industrial cleaning solvents.

2. Federal Requirements

The Permittee has four (4) existing stationary reciprocating internal combustion engines (RICE) that may be subject to the Federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) under 40 CFR Part 63 Subpart ZZZZ.

In addition, the Permittee has proposed to install two diesel fire pumps and one diesel emergency engine that may also be subject to CFR Part 63 Subpart ZZZZ, and Standards of Performance for New Stationary Sources for emergency compression ignition reciprocating engines under 40 CFR 60 Subpart IIII.

Since MassDEP has not accepted delegation for Subparts ZZZZ or IIII, you are advised to consult with the United States Environmental Protection Agency (USEPA) for additional information. There may be additional notification, record keeping, and reporting requirements. Their address is USEPA Region 1, 5 Post Office Square – Suite 100, Boston, MA 02109-3912.

This Plan Approval, NE-23-016 (ePLACE Authorization No.: AQ02P-0000073) supersedes Plan Approval NE-21-024, issued to the Permittee on March 22, 2022, in its entirety, with exception of all plan application materials submitted as part of the Plan Approval NE-21-024 become part of this Plan Approval, NE-23-016.

2. EMISSION UNIT IDENTIFICATION

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

Table 1

EU[a]	Description	Design Capacity	Pollution Control Device
EU1	Cleaver Brooks Boiler # CB 665-700	29.291 million British thermal units per hour (MMBtu/hr)	None
EU3	Cleaver Brooks Boiler # CB 665-700	29.291 MMBtu/hr	None
EU5	Aerosol Can Filling Line No. 1	Maximum filling of 300 aerosol cans per minute	None
EU10	Pilot Lab (LPFM)	95 gallons propellant per hour 116 gallons concentrate per hour	None
EU12	Tank Farm Propellant Tank (Tank No. V-102) above ground tank holding A-46 propellant	25,000 gallons (V-102)	None
	Tank Farm Propellant Tank (Tank No. V-103) above ground tank holding Blowing Agent	25,000 gallons (V-103)	
	Tank Farm Propellant Tank (Tank No. V-104) above ground tank (spare)	30,000 gallons (V-104)	
EU13	Cummins H6-1F Diesel (CI RICE) Fire Pump No. 3	4 gallons of fuel oil per hour (< 3 MMBtu/hr)	None
EU14	Cummins NH-220 Diesel (CI RICE) Fire Pump No.2	4 gallons of fuel oil per hour (< 3 MMBtu/hr)	None
EU17	Aerosol Can Filling Line No. 5	150 units per minute	None
EU19	Date Coding	409,968,000 units per year	None
EU23	Gas Room and Critical Power Propane (SI RICE) Emergency Generator Kohler 30RZGB	30 kW output	None
EU24	LMR Sump and Emergency Power Propane (SI RICE) Emergency Generator Kohler 30RZGB	30 kW output	None
EU25	Miscellaneous Gas Room venting, changeovers, evacuations and head repairs.	N/A - activity performed as per maintenance and production schedule	None

EU[a]	Description	Design Capacity	Pollution Control Device
EU26	Cleaning / Sanitizing alcohol usage (70% ethanol) for QA/QC Operations	70% ethanol used for microbial control on equipment from hand wiping operations, (spray/squirt bottles, etc.)	None
EU27[b]	Lubricating oil usage in three new blade perforation presses	0.21 gallons per hour	None
EU28[b]	Isopropanol usage in QA / QC cleaning of new injection molding equipment	90-100% isopropanol used in cleaning operations (spray/squirt bottles, etc.)	None
EU29[b]	Various new blade treatment and razor manufacturing operations	NA	None
Industrial Cleaning Solvents[b]	Industrial Cleaning Solvents	Less than 2.9 TPY of VOC emissions	None

Table 1 Key:

EU = Emission Unit
PCD = Pollution Control Device
MMBtu/hr = million British thermal units per hour
VOC = volatile organic compounds
kW = kilowatts
QA / QC = quality assurance / quality control
CI RICE = compression ignition reciprocating internal combustion engine
SI RICE = spark ignition reciprocating internal combustion engine
LPFM = Laboratory Propellant Filling Module
LMR = Liquid Mix Room
NA = not applicable
< = less than
TPY = tons per rolling 12-month period

Table 1 Notes:

[a] Line 4 (formerly EU7) is not included in this table.
[b] EU27, EU28, EU29, and Industrial Cleaning Solvents are the new units proposed in this plan application 23-AQ02P-0014-APP. All other emission units have been previously approved by NE-21-024 Plan Approval.

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
EU1 EU3	NA	SO_2	≤ 0.02 tons per month ≤ 0.2 tons per rolling 12-month period
		NO_x	≤ 2.2 tons per month ≤ 25.7 tons per rolling 12-month period
		PM	0.15 pound/MMBtu
EU5	NA	VOC	≤ 1.6 tons per month ≤ 7.9 tons per rolling 12-month period
EU10	NA	VOC	≤ 0.5 tons per month ≤ 2.0 tons per rolling 12-month period
EU12	Restricted to miscellaneous bulk tanker hose disconnects during deliveries and tank evacuations & venting for periodic tank maintenance and inspections	VOC	≤ 2.0 tons per month ≤ 4.0 tons per rolling 12-month period
EU13 EU14	No. 2 fuel oil ≤ 0.0015% Sulfur by weight / ≤ 167 gallons per month, combined, ≤ 2000 gallons per rolling 12-month period, combined	Sulfur in fuel	≤ 15 ppm

EU	Operational / Production Limit	Air Contaminant	Emission Limit
EU17	NA	VOC	≤ 1.4 tons per month ≤ 6.0 tons per rolling 12-month period
EU19	NA	VOC	≤ 1 ton per month ≤ 3 tons per rolling 12-month period
EU25	NA	VOC	≤ 1.0 ton per month ≤ 4.0 tons per rolling 12-month period
EU26	NA	VOC	≤ 1.0 ton per month < 3.0 tons per rolling 12-month period
EU27	1854.5 gallons of perforation press lubricating oil per rolling 12-month period	VOC	≤ 1.25 tons per month ≤ 5.98 tons per rolling 12-month period
		$PM_{2.5}$	≤ 1.25 tons per month ≤ 5.98 tons per rolling 12-month period
EU28	1200 liters of isopropanol per rolling 12-month period	VOC	≤ 0.26 tons per month ≤ 1.04 tons per rolling 12-month period
EU29	NA	VOC	≤ 0.15 tons per month ≤ 0.60 tons per rolling 12-month period
		$PM_{2.5}$	≤ 0.29 tons per month ≤ 1.12 tons per rolling 12-month period

EU	Operational / Production Limit	Air Contaminant	Emission Limit
Industrial Cleaning Solvents	Actual usage of VOC containing cleaning solvents will result in less than 2.9 tons VOC emissions per 12-month rolling period	VOC	1.0 ton per month 2.9 tons per rolling 12-month period
		Total HAPs	1.0 ton per month 2.9 tons per rolling 12-month period
Facility-wide	NA	VOC	≤ 12.8 tons per month ≤ 39.0 tons per rolling 12-month period
		Any single HAP	≤ 4.9 tons per month ≤ 7.5 tons per rolling 12-month period
		Total HAP	≤ 9.0 tons per month ≤ 19.5 tons per rolling 12-month period
		SO_2	≤ 0.06 ton per month ≤ 0.6 ton per rolling 12-month period
		NO_x	≤ 2.5 tons per month ≤ 30.4 tons per rolling 12-month period
		CO	≤ 2.1 tons per month ≤ 23.9 tons per rolling 12-month period
		Smoke	< No. 1 of Chart [b], except No. 1 to < No. 2 of Chart for ≤ six (6) minutes during any one hour
		Opacity	≤ 20 percent except 20 to ≤ 40 percent for ≤ two (2) minutes during any one hour

Table 2 Key:

EU = Emission Unit
CO = Carbon Monoxide
PM = Total Particulate Matter
$PM_{2.5}$ = Particulate Matter less than or equal to 2.5 microns in diameter
HAP = Hazardous Air Pollutant
CMR = Code of Massachusetts Regulations
< = less than
NO_x = Nitrogen Oxides
SO_2 = Sulfur Dioxide
VOC = Volatile Organic Compounds
NA = not applicable
MMBtu = Million British Thermal Unit
CFR = Code of Federal Regulations
< = less than or equal to

Table 2 Notes:

[a] Facility-wide emission limits include all permitted as well as insignificant activities, exempt sources, and Environmental Results Program (ERP) sources.

[b] Chart means the Ringelmann Scale for grading the density of smoke, as published by the United States Bureau of Mines and as referred to in the Bureau of Mines Information Circular No. 8333, or any smoke inspection guide approved by the Department.

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
EU1, EU3	1. The Permittee shall monitor natural gas usage for the boilers on a monthly and twelve-month rolling period (current month plus the sum of the previous eleven months). Said monitoring shall also include a calculation of the resulting emissions from said usage so that compliance with the record keeping requirements in Table 4, proviso No. 1 of this Plan Approval shall be maintained.
	2. The Permittee shall monitor unit operations to ensure continuous compliance with the particulate matter emission limits contained in Table 2 of this Plan Approval.
	3. The Permittee shall inspect and maintain any fuel utilization facility, having an energy input capacity of ≥ 3 MMBtu per hour in accordance with manufacturer's recommendations and test for efficient operation at least once in each calendar year as provided in 310 CMR 7.04(4)(a) incorporated herein by reference.
EU5	4. The Permittee shall monitor monthly records to demonstrate that the VOC and single and total HAP emissions do not exceed the emission levels specified in Table 2 of this Plan Approval. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and single and total HAPs for the month as well as the prior 11 months.
EU5, EU10, EU12, EU17, EU19, EU25, EU26, EU27, EU28, EU29	5. The Permittee shall monitor facility operations such that compliance with the restrictions and emission limitations/standards contained in Table 2 of this Plan Approval can be determined.
EU12	6. The Permittee shall monitor operations so that new Tank Farm operators are taught the Propellant Tank Farm Emission Minimization Program within the first week of a new Tank Farm operator's hiring/transfer, whenever a new person is assigned to the Tank Farm for a period of longer than one month.

EU	Monitoring and Testing Requirements
EU12	7. As part of its Tank Farm Leak Detection and Repair Program (TFLDRP), which includes propellant emission sources, the Permittee shall inspect all components of the Tank Farm and outdoor piping on a semi-annual basis.
	8. The Tank Farm operator shall monitor information about each tank truck delivery, including the date, propellant type, and the operator's initials. The Tank Farm operator shall monitor emissions from each tank maintenance/inspection activity.
	9. The Permittee shall monitor tank farm emissions from miscellaneous tanker truck hose disconnects and from maintenance and inspection activities.
EU13, EU14, EU23, EU24	10. The Permittee shall monitor fuel consumption for the fire pumps and emergency engines on a monthly and twelve-month rolling period (current month plus the sum of the previous eleven months). Said monitoring shall also include the sulfur content of the fuel oil used and a calculation of the resulting emissions from said usage.
EU1, EU3, EU13, EU14, EU23, EU24	11. The Permittee shall monitor that fuel purchase receipts are kept for each unit.
	12. Equipment or emissions monitoring systems used for the purposes of documenting compliance with restrictions/emission limits in Table 2 of this Plan Approval shall be calibrated, maintained, and operated in sufficient manner to ensure continuous and accurate operation at all times.
EU25	13. The Permittee shall monitor that seal-less booster pumps are being utilized.
	14. The Permittee shall monitor operations of its Reduced Pump Pressure Program. Under this program, the Permittee shall post next to each filling line the matrix of optimal pump pressures as a function of can size and fill speed (which itself is a function of numerous variables, such as aerosol valve configuration). The Permittee shall update its matrices as necessary. Copies of all matrices, including outdated matrices, shall be included in the RACT Compliance Files for at least five (5) years and must be available for MassDEP and USEPA review. MassDEP and USEPA may review the matrices as posted next to the gassing rooms, as well. The Permittee's Changeover Procedures shall be revised to require use of the matrix. This SOP for Changeover Procedures must also be available for MassDEP and USEPA review.
	15. The Permittee shall monitor gas room safety venting. Specifically, the gas room operator's initials, date, time, reason, location, and approximate amount of VOC that is vented must be documented. Actively used records must be kept by each filling room, and accumulated records must be stored in the RACT Compliance Files for at least five (5) years and made available for MassDEP and EPA review.
	16. The Permittee shall monitor records of attendance lists of the required semi-annual Gas Room Operator (GRO) Training (formerly known as Hydrocarbon Safety Training).

EU	Monitoring and Testing Requirements
EU25	17. The Permittee shall continue use of its comprehensive Aerosol Filling Room Leak Detection and Repair Program (AFRLDRP). The AFRLDRP shall be conducted at least semi-annually on all gassing room pipeline hardware. The Permittee shall monitor the dates that the AFRLDRP are conducted to verify that it is being conducted at least semiannually as required.
EU26	18. The Permittee shall monitor the amount of VOC solvents used for QA/QC operations, in any twelve-month rolling period, to demonstrate compliance with record keeping requirements in Table 4.
EU27	19. The Permittee shall monitor the amount of perforation press lubricating oil used and resultant VOC and $PM_{2.5}$ emissions to demonstrate compliance with record keeping requirements in Table 4.
EU28	20. The Permittee shall monitor the usage of QA / QC isopropanol in mold cleaning operations and resultant VOC emissions to demonstrate compliance with record keeping requirements in Table 4.
EU29	21. The Permittee shall monitor the various lubricants and coatings used and resultant VOC and $PM_{2.5}$ emissions to demonstrate compliance with record keeping requirements in Table 4.
Facility-wide	22. The Permittee shall monitor the amount of VOC solvents used for industrial solvent cleaning operations so that, in any consecutive twelve-month period to demonstrate that the VOC emissions are less than the 2.9 tons per twelve month rolling period.
	23. The Permittee shall monitor operations such that the records of the facility-wide VOC, single and total HAPs, SO_2, CO, and NOx emissions on a monthly and twelve-month rolling period are maintained so that compliance with the emission limits in Table 2 of this Plan Approval shall be documented.
	24. The Permittee shall monitor facility operations for instances of deviation from this Plan Approval.
	25. When a new aerosol-packaged product is considered for introduction, the standard testing procedures shall include evaluation of the technical feasibility of TTV filling. If technically feasible, the new product shall be TTV-filled.
	26. The Permittee shall monitor alcohol usage on a monthly basis in the RACT Compliance Files for at least five (5) years and be made available for MassDEP and USEPA inspection.
	27. The Permittee shall inspect and maintain each fuel utilization facility, having an energy input capacity of $\geq$ 3 MMBtu/hr in accordance with manufacturer's recommendations and test for efficient operation at least once in each calendar year as provided in 310 CMR 7.04(4)(a) incorporated herein by reference.
	28. The Permittee shall monitor operations to assure that TTV (through the valve) filling is being used for its entire current shave cream (non-gel) products. The Permittee must also monitor that for any new shave cream (non-gel) products, TTV filling is evaluated for technical feasibility, and used if technically feasible.

EU	Monitoring and Testing Requirements
Facility-wide	29. The Permittee shall monitor the sulfur content of each new shipment of fuel oil received. Compliance with sulfur content shall be demonstrated through testing or maintaining a shipping receipt from the fuel supplier. The shipment certification or testing of sulfur content of fuel oil shall be in accordance with the applicable American Society for Testing Materials (ASTM) test methods or any other method approved by MassDEP and USEPA.
	30. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration and 310 CMR 7.71 Greenhouse Gas Reporting, as applicable.
	31. The Permittee shall monitor facility operations such that VOC are stored and disposed of in a manner that will minimize evaporation to the atmosphere.
	32. The Permittee shall monitor facility operations such that the records of all monitoring data and supporting information are kept on site for a period of at least five (5) years from the date of the monitoring sample, measurement, or report. Supporting information includes at a minimum, all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required, and any other information required to interpret the monitoring data. Records required to be maintained shall include, where applicable: a) The date, place as defined in the Permit, and time of sampling or measurements; b) the date(s) analyses were performed; c) the company or entity that performed the analyses; d) the analytical techniques or methods used; e) the results of such analyses; and f) the operating conditions as existing at the time of sampling or measurement.
	33. 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.
	34. At least 30 days prior to emission testing, the Permittee shall submit to MassDEP for approval a stack emission pretest protocol.
	35. Within 60 days after emission testing, the Permittee shall submit to MassDEP a final stack emission test results report.
	36. The Permittee shall monitor all operations to ensure compliance with the requirements contained in Table 2.

Table 3 Key:

EU = Emission Unit
VOC = Volatile Organic Compounds
NOx = Nitrogen Oxides
SO_2 = Sulfur Dioxide
CO = Carbon Monoxide
PM = Total Particulate Matter
$PM_{2.5}$ = Particulate Matter less than or equal to 2.5 microns in diameter
HAP = Hazardous Air Pollutants
PTE = Permanent Total Enclosure
≥ = greater than or equal to
> = greater than
MassDEP = Massachusetts Department of Environmental Protection
USEPA = United States Environmental Protection Agency
SOMP = Standard Operating and Maintenance Procedure
CMR = Code of Massachusetts Regulations
RACT = Reasonably Achievable Control Technology
SOP = Standard Operating Procedure
BMS = Building Management System
CFR = Code of Federal Regulations

Table 4

EU	Record Keeping Requirements
EU1, EU3	1. The Permittee shall maintain a record of natural gas usage for the boilers on monthly and twelve-month rolling period (current month plus the sum of the previous eleven months) so that compliance with the fuel restrictions contained in Table 2 of this Plan Approval shall be documented. Said records shall also a calculation of the resulting emissions from said usage.
	2. The Permittee shall maintain record unit parameters, as necessary, to ensure continuous compliance with particulate emission limits.
	3. In accordance with 310 CMR 7.04(4)(a), the Permittee shall maintain results of fuel utilization facility inspection, maintenance, and testing and the date upon which it was performed posted conspicuously on or near the facility.
EU5, EU10, EU12, EU17, EU19, EU25, EU26 EU27, EU28, EU29	4. The Permittee shall maintain adequate monthly records to demonstrate that the VOC, $PM_{2.5}$, and single and total HAP emissions do not exceed the emission levels specified in Table 2 of this Plan Approval. At a minimum, the information shall include a list of the VOC-containing materials and HAP-containing materials used during the month, the VOC content of each material, and the actual emissions of VOC and single and total HAPs for the month as well as the prior 11 months. The MassDEP approved On-Site Record Keeping Form can be downloaded at https://www.mass.gov/guides/massdep-facility-wide-emission-restrictions-caps-reporting#WorkbookforReportingOn-SiteRecordKeeping. These records shall be maintained on site for a minimum of five (5) years and shall be made available to MassDEP personnel upon request.
EU12	5. The Permittee shall maintain result reports from the semi-annual inspection of all components of the Tank Farm and outdoor piping and all repair records as a result of the Tank Farm Leak Detection and Repair program must be maintained in the RACT Compliance Files for at least five (5) years and must be made available for DEP and USEPA inspection.
	6. The Permittee shall maintain a record of Tank Farm operator training.
	7. The Permittee's Tank Farm operator shall record information about each tank truck delivery, including the date, propellant type, and the operator's initials. These records shall be kept in the RACT Compliance Files for at least five (5) years and must be made available for DEP and USEPA inspection.
EU13, EU14, EU23, EU24	8. The Permittee shall maintain a record of fuel consumption for these emission units on a monthly and twelve-month rolling period (current month plus the sum of the previous eleven months). Said records shall also include the sulfur content of the fuel oil used and a calculation of the resulting emissions from said usage.

EU	Record Keeping Requirements
EU1, EU3, EU13, EU14, EU23, EU24	9. The Permittee shall maintain on file fuel purchase receipts for each unit.
EU17	10. The Permittee shall maintain a continuous record keeping system on-site. All records shall be maintained up to date such that year-to-date information is readily available for MassDEP examination. Recordkeeping shall, at a minimum, include: a. Maintenance. A record of routine maintenance activities including, at a minimum, a description of the maintenance performed and the date and time the work was completed. b. Malfunctions. A record of all malfunctions including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed, and the facility returned to compliance. c. Records shall be maintained documenting the air contaminant emission analysis supporting the response to BWP AQ 01-B Section-C. d. All records shall be kept on site for five (5) years from date of record and shall be made available to the MassDEP upon request.
EU25	11. The Permittee shall maintain a record of the dates that the Aerosol Filling Room Leak Detection and Repair Program (AFRLDRP) are conducted to verify that it is being conducted at least semiannually.
	12. The Permittee shall maintain a record of attendance lists of the required semi-annual Gas Room Operator (GRO) Training (formerly known as Hydrocarbon Safety Training).
	13. The Permittee shall maintain a record of gas room safety venting. Specifically, the gas room operator's initials, date, time, reason, location, and approximate amount of VOC that is vented must be documented. Actively used records must be kept by each filling room, and accumulated records must be stored in the RACT Compliance Files for at least five (5) years and made available for DEP and USEPA review.
EU26	14. The Permittee shall maintain a record of the amount of alcohol used and the resultant VOC emissions, in any twelve-month rolling period, to demonstrate compliance with the emission limits in Table 2.
EU27	15. The Permittee shall maintain a record of the amount of perforation press lubricating oil used and the resultant VOC and $PM_{2.5}$ emissions to demonstrate compliance with the operational and emission limits in Table 2.
EU28	16. The Permittee shall maintain a record of the amount of QA / QC isopropanol being used in mold cleaning operations and the resultant VOC emissions to demonstrate compliance with the operational and emission limits in Table 2.

EU	Record Keeping Requirements
EU29	17. The Permittee shall maintain records of various lubricants and coatings used and the resultant VOC and $PM_{2.5}$ emission to demonstrate compliance with the emission limits on Table 2.
Facility-Wide	18. 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 15th day following each month. An electronic version of a MassDEP approved record keeping form, in Microsoft Excel format, may be downloaded at https://www.mass.gov/guides/massdep-facility-wide-emission-restrictions-caps-reporting#WorkbookforReportingOn-SiteRecordKeeping.
	19. The Permittee shall comply with the recordkeeping requirements contained in 310 CMR 7.26(42)(f) to demonstrate compliance
	20. The Permittee shall maintain a record of any exceedance of any limitation/restriction established in Table 2 of this Plan Approval.
	21. The Permittee shall maintain dedicated RACT Compliance Files, in order to determine compliance. All files must display the date of initial filing. All files shall be maintained for a period of at least five (5) years after the initial date of filing. The files shall be made available to MassDEP and USEPA personnel for inspection. The Permittee may modify and/or improve the current record keeping forms without notification, provided that all of the information in the current record keeping forms necessary to determine compliance is still available.
	22. The Permittee shall maintain copies of any TTV (through the valve) technical feasibility evaluation results for new aerosol packaged product s in the RACT Compliance Files for at least five (5) years and shall be made available for MassDEP and USEPA review.
	23. The Permittee shall maintain a record of the evaluation of TTV adapters for any new shave cream products (non-gel) in the files for a period of at least five (5) years and made available for MassDEP and USEPA inspection.
	24. The Permittee shall maintain records of industrial cleaning solvent usage in the RACT Compliance Files for at least five (5) years and make them available for MassDEP and USEPA inspection.
	25. The results of the required inspection, maintenance, and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near each fuel utilization facility having an energy input capacity of $\geq$ 3 MMBtu/hr, as provided in 310 CMR 7.04(4)(a) incorporated herein by reference. Said records shall be maintained on site for a period of the five (5) most recent years.

EU	Record Keeping Requirements
Facility-Wide	26. The Permittee shall maintain fuel purchase records in order to demonstrate compliance with fuel sulfur content requirements as provided in 310 CMR 7.05(1) incorporated herein by reference. Said records shall be maintained on site for a period of the five (5) most recent years.
	27. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	28. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up to date SOMP for the EU(s) approved herein on-site.
	29. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(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.
	30. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) 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.
	31. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration and 310 CMR 7.71 Greenhouse Gas Reporting, as applicable
	32. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	33. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU = Emission Unit
MassDEP = Massachusetts Department of Environmental Protection
≥ = greater than or equal to
VOC = Volatile Organic Compounds
PM = Total Particulate Matter
$PM_{2.5}$ = Particulate Matter less than or equal to 2.5 microns in diameter
HAP – Hazardous Air Emissions
USEPA = United States Environmental Protection Agency
PTE = Permanent Total Enclosure
SOMP = Standard Operating and Maintenance Procedure
% = percentage
CMR = Code of Massachusetts Regulations

Table 5

EU	Reporting Requirements
EU27, EU28, EU29	1. The Permittee shall submit, within 60 days of completion when the installation of the subject equipment, a Standard Operating and Maintenance Procedures (SOMP) to the MassDEP NERO BAW Permit Chief by email: NERO.Air@mass.gov. The SOMP shall include, but is not limited to, inspection and maintenance checklists for these operations. Any updated versions of the SOMP shall be submitted to MassDEP at least thirty (30) days prior to implementation.
Facility-wide	2. The Permittee shall report annually to MassDEP, in accordance with 310 CMR 7.71, all required greenhouse gas emissions, as applicable.
	3. The Permittee shall submit to MassDEP NERO, attention BAW Permit Chief by email: NERO.Air@mass.gov a written test protocol for review and approval at least thirty (30) days prior to the commencement of any compliance testing. This test protocol shall describe the test methodologies to be employed during the required compliance testing.
	4. The Permittee shall submit to MassDEP NERO BAW Permit Chief via MassDEP's Compliance Reporting System (https://eeaonline.eea.state.ma.us/EEA/ComplianceReport/ an Emissions Compliance Testing Report for review and approval within sixty (60) days of the completion of the Emissions Compliance Testing.
	5. The Permittee shall submit to MassDEP NERO BAW Permit Chief by email: NERO.Air@mass.gov 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).
	6. The Permittee shall notify the MassDEP NERO, BAW Permit Chief by email: NERO.Air@mass.gov, 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 via MassDEP's Compliance Reporting System (https://eeaonline.eea.state.ma.us/EEA/ComplianceReport/) under Exceedance Report (EXCDNC), 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).
	7. The Permittee shall report every three years to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form.

EU	Reporting Requirements
Facility-wide	8. All notifications required and not specified by this Approval shall be made to: MassDEP NERO, attention BAW Permit Chief by telephone: (978)-694-3200, email: NERO.Air@mass.gov.
	9. The Permittee shall provide a copy to MassDEP or USEPA of any record required to be maintained by this Plan Approval within 30 days from MassDEP's or USEPA's request.

Table 5 Key:

EU = Emission Unit
MassDEP = Massachusetts Department of Environmental Protection
NERO = Northeast Regional Office
SOMP = Standard Operating and Maintenance Procedure
USEPA = United States Environmental Protection Agency
BAW = Bureau of Air and Waste
CMR = Code of Massachusetts Regulations

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
EU12	1. Tank truck hatches in the Tank Farm shall be closed at all times except during loading or unloading.
	2. The Permittee shall continue to use the comprehensive Tank Farm Leak Detection and Repair Program (TFLDRP) which includes propellant fugitive emission sources. All components of the Tank Farm and outdoor piping shall be inspected semi-annually.
	3. The Permittee shall train new Tank Farm operators using the Propellant Tank Farm Emission Minimization Program within the first week of a new Tank Farm operator's hiring/transfer, whenever a new person is assigned to the Tank Farm for a period of longer than one month.
EU25	4. The Permittee shall continue to use the seal-less booster pumps.
	5. The Permittee shall conduct semi-annual Gas Room Operator (GRO) Training (formerly known as Hydrocarbon Safety Training) for gas room mechanics.
	6. The Permittee shall continue its present gas room safety venting practice of venting only for reasons of maintenance, emergencies and/or long-term shutdowns (i.e., anticipated 7 days out of use).
Facility-wide	7. The Permittee shall become subject to the VOC Reasonably Available Control Technology (RACT) requirements for Industrial Solvent Cleaning, should actual VOC emissions from these operations exceed 3.0 tons per any consecutive twelve-month period. Should this occur, the Permittee shall ensure that it complies with 310 CMR 7.18(31).
	8. Any Reciprocating Internal Combustion Engine in the Facility may be subject to 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Since MassDEP has not accepted delegation for Subparts IIII or ZZZZ for facilities such as this, the Permittee is advised to consult with EPA for additional information regarding applicable requirements that may apply to the Facility. EPA's address: US EPA Region 1, 5 Post Office Square – Suite 100, Boston, MA 02109-3912.

EU	SPECIAL TERMS AND CONDITIONS
Facility-wide	9. The Permittee shall continue to use TTV (Through the Valve) adapters for all of its current shave cream (non-gel) products. For any new shave cream (non-gel) products, TTV adapters must be evaluated for technical feasibility, and used if technically feasible.
	10. The Permittee must minimize the use of ethanol for non-production use (labs & parts cleaning) and must continue to track its alcohol usage on a monthly basis. These records will be kept in the RACT Compliance Files for at least five (5) years and be made available for MassDEP and EPA inspection.
	11. The Permittee shall continue to utilize pollution prevention techniques, such as TTV filling, whenever feasible to minimize VOC losses.

EU	SPECIAL TERMS AND CONDITIONS
Facility-wide	12. Should a new type of propellant be chosen or a concentrate solvent substitute for ethanol be chosen other than those listed below, the Permittee shall evaluate the effects of the change and notify the MassDEP and USEPA in writing of the substitution, the effect on emissions and other effects of the proposed change prior to making the change. The Permittee shall maintain records on these reformulations changes that require MassDEP and USEPA notification and shall keep the records in its RACT Compliance Files for at least five (5) years. Propellants and concentrates considered acceptable to substitute or use without notification include: <u>Acceptable materials for normal production of aerosol-packaged products:</u> Acceptable propellants: a. propane b. normal butane c. pentane d. isopentane (as a propellant; isopentane is now used as a "blowing agent") e. dimethyl ether f. propellant HFC-152A g. isobutane h. combinations of any of the above propellants Acceptable solvents: a. any type of ethanol for production <u>Acceptable material for normal production and ancillary operation:</u> The Permittee may use the following materials without prior MassDEP and USEPA approval provided that facility continues to use pollution prevention techniques to minimize emissions, and maintains emission records: a. any solvents or materials in the laboratories; b. any cleaning solvents associated with ancillary operations.
	13. The Permittee shall comply with 310 CMR 7.18(1)(c) which requires that VOC be stored and disposed of “in a manner which will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight-fitting cover. Proper disposal shall include incineration in an incinerator approved by the Department, transfer to another person licensed by the Department to handle VOC, or any other equivalent method approved by the Department."
	14. All VOC or single and total HAPs containing materials, such as solvents and clean-up solutions, shall be transported and stored in tightly covered containers.

EU	SPECIAL TERMS AND CONDITIONS
Facility-wide	15. All cleaning rags used in conjunction with the cleaning solutions shall be placed in tightly covered containers when not in use and shall be collected for proper recycling or disposal.
	16. The Permittee is subject to the requirements of 42 U.S.C. 7401, section 112(r) Accidental Release Prevention Requirements: Risk Management under Clean Air Act 112(r)(7) and has submitted to the "regulating authority" the facility's contingency plan for responding to accidental releases of regulated substances.
	17. The Permittee is subject to the requirements of 40 CFR 82: Protection of Stratospheric Ozone and the USEPA enforces these requirements.
	18. The Permittee is subject to the requirements of 40 CFR Part 59, Subpart C and the USEPA enforces these requirements.
	19. The Permittee is subject to the requirements of 310 CMR 7.25, Best Available Controls for Consumer and Commercial Products.
	20. This Plan Approval, NE-23-016 (ePLACE Authorization No.: AQ02P-0000073) supersedes Plan Approval NE-21-024, issued to the Permittee on March 22, 2022, in its entirety, with exception of all plan application materials submitted as part of the Plan Approval NE-21-024 become part of this Plan Approval, NE 23 016.

Table 6 Key:

EU = Emission Unit
VOC = volatile organic compounds
HAP = hazardous air pollutant
RACT = Reasonably Control Technology
CMR = Code of Massachusetts Regulations
MassDEP = Massachusetts Department of Environmental Protection
USEPA = United States Environmental Protection Agency
TTV = Through the Valve
CFR = Code of Federal Regulation
U.S.C = United States Code

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 laws or regulations now or in the future.

F. The Application is incorporated into this Plan Approval by reference. 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 OF DECISION

This Decision is an action of MassDEP. If you are the applicant, an aggrieved person who has submitted written comments, where applicable, or a ten persons group that has submitted written comments, where applicable, you may request an adjudicatory hearing in accordance with 310 CMR 7.51(1). A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Decision.

Under 310 CMR 1.01(6)(b), the request for adjudicatory hearing 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 Decision is not consistent with applicable laws and regulations. In the request, an aggrieved person must state with specificity the basis of his or her claim of aggrievement. A ten persons group that files a request for an adjudicatory hearing must include affidavits from each person of the group stating their intent to be a part of the group and to be represented by the group's authorized representative. The request must comply with all other requirements of 310 CMR 1.01.

The issues raised in the request for adjudicatory hearing are limited to the subject matter of this Decision and are limited further to the issues raised during the public comment period. If the issue was not raised during the public comment period, the issue may be raised upon showing that it was not reasonably possible with due diligence to have raised such matter during the public comment period or for good cause shown.

The hearing request along with a valid check payable to Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) and a completed Adjudicatory Hearing Fee Transmittal Form found at https://www.mass.gov/doc/adjudicatory-hearing-fee-transmittal-form/download must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

An aggrieved person or a ten persons group shall send a copy of the request for an adjudicatory hearing by first class mail to the Applicant and MassDEP's contact person listed in the Decision.

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, district of the Commonwealth of Massachusetts, the Massachusetts Bay Transportation Authority, federally recognized Indian tribe housing authority, effective January 14, 1994, 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, a request for the waiver of the fee and an affidavit setting forth the facts believed to support the claim of undue financial hardship as specified in 310 CMR 4.06(2).

Should you have any questions concerning this Plan Approval, please contact Flavia Jacobs by telephone at 978-857-2922, or in writing at the letterhead address.

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.

Flavia Paolucci Jacobs
Permit Writer

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.

Edward J. Braczyk
Permit Chief
Bureau of Air and Waste

Eccs: P&G Gillette (Andover) - Ms. Yleana Campos Cuevas, Mr. Drew Hadley (PG Consultant)
MassDEP/Boston - Yi Tian
MassDEP/NERO - John MacAuley, Scott Fasulo, Quan Tat, Mun Wong
Epsilon Associates – Mr. A.J. Jablonowski, PE, Ms. Katerina Matjucha
Andover Board of Health
Andover Fire Department