



Commonwealth of Massachusetts  
Executive Office of Environmental Affairs

**Department of  
Environmental Protection**  
Southeast Regional Office

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Governor

Trudy Coxe  
Secretary, ECEA

Thomas B. Powers  
Acting Commissioner

COPY

March 16, 1994

Mr. Kenneth Joblon  
Brittany Dyeing and Printing  
1357 East Rodney French Boulevard  
New Bedford, Massachusetts 02742

RE: SMAPCD--NEW BEDFORD  
310 CMR 7.18(17),  
Reasonably Available  
Control Technology  
(RACT), Plan Approval No.  
4P92012, Action E-V7,  
Source No. 0290  
Transmittal No.29093

Dear Mr. Joblon:

The Department of Environmental Protection, Division of Air Quality Control, has reviewed Plan Application No. 4P92012 regarding volatile organic compound (VOC) emissions generated by textile processing operations at Brittany Dyeing and Printing Corporation, 1357 East Rodney French Boulevard, New Bedford, Massachusetts. The plan application submittal was made to demonstrate that Brittany Dyeing and Printing Corporation is employing Reasonably Available Control Technology (RACT) to control VOC emissions at its textile processing facility pursuant to Department regulation 310 CMR 7.18(17). The application was submitted in accordance with Section 7.18 Volatile and Halogenated Organic Compounds as contained in 310 CMR 7.00 "Air Pollution Control Regulations" adopted by the Department pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-E, and Chapter 21C, Section 4 and 6.

Brittany Dyeing and Printing Corporation (Brittany) was required to submit this RACT Plan when the Department determined that Brittany's VOC emissions for calendar year 1990 were greater than 100 tons. Brittany had previously been limited to a maximum of 96.6 tons per year of VOC emissions by Plan Approval No. 4P87014. The emission cap established in Plan Approval No. 4P87014 was based on the Department's pre-1989 definition of VOC and Brittany's VOC emissions calculated for 1990 were based on the Department's definition of VOC which was adopted in September 1989. Brittany was notified on October 21, 1991 that its facility was subject to 310 CMR 7.18(17) RACT.

3. Daily usage and emissions of VOC from all VOC-containing materials used in the fabric printing process shall not exceed 3170 pounds per day (1.59 tons per day). Recordkeeping, in accordance with attached Table D, shall verify compliance with the fabric printing process daily emission limit.

**B. Fabric Finishing**

1. Brittany shall use fabric finishing mixtures with a VOC content, as applied to the substrate, at or below 0.50 pounds of VOC per pound of solids. Water and EPA-excluded nonreactive organic material are excluded from this calculation. Use of any new fabric finishing mixtures shall not result in emissions in excess of 0.50 pounds of VOC per pound of solids, as applied to the substrate. Recordkeeping, in accordance with attached Table B, shall verify compliance with the fabric finishing VOC to solids ratio approved herein.
2. Brittany shall be permitted to use the VOC containing materials listed below in the fabric finishing process. VOC emissions from these materials, based on a twelve month rolling average, shall be limited as follows:

<u>PRODUCT</u>	<u>LBS VOC PER 12 MONTH AVE</u>
Knit Pseudo - selvage	18,504
Knit Pseudo - selvage	
Auxiliary Product	4,993

3. Daily usage and emissions of VOC from all VOC-containing materials used in the fabric finishing process shall not exceed 318 pounds per day (0.159 tons per day). Recordkeeping, in accordance with attached Table E, shall verify compliance with the fabric finishing process daily emission limit approved herein.

**C. Fabric Dyeing**

1. Brittany shall use fabric dyeing formulations with a VOC content, as applied to the substrate, at or below 0.50 pounds of VOC per pound of solids. The sole exception to this VOC emission limit shall be Polyester Carrier, which has a VOC content of 5.047 pounds of VOC per pound of solids. Water and EPA-excluded nonreactive organic material are excluded from this calculation. Use of any new fabric dyeing formulations shall not result in emissions

- A. Fabric Printing - 580.0 tons per year
- B. Fabric Finishing - 58.0 tons per year
- C. Fabric Dyeing - 67.5 tons per year
- D. Process Cleaning - 42.6 tons per year

Note: Tons per Year are based on a 12 month rolling average.

- 3. Brittany shall maintain daily VOC formulation, usage and emission logs for VOC-containing material as shown in the attached Tables A through G.
- 4. Brittany shall maintain daily VOC emission records for its fabric printing, fabric finishing, fabric dyeing processes, and process cleaning operations as required by Tables D, E, F and G. These emissions shall be tracked as follows:
  - A. Fabric Printing - Brittany will generate an emission factor based on historical print color usage data. This emission factor shall be expressed in units of pounds of VOC per thousand yards of printed fabric. The initial emission factor will be generated from a previous twelve month rolling average of VOC usage and yards printed. The emission factor will be updated on the 15th of every month. On a daily basis, yards printed will be multiplied by the fabric printing VOC emission factor and VOC emissions for that day will be recorded. A day will consist of a 24 hour period starting at 7:00 AM on one day and ending at 7:00 AM on the next day. See attached Table D for recordkeeping format.
  - B. Fabric Finishing - Brittany will generate an emission factor for each finishing mixture to be expressed in units of pounds of VOC per 100 gallons of finishing solution. The gallons of finish mixed per day and the gallons of finish applied per day shall be recorded daily. On a daily basis, the gallons of each finish mixed will be multiplied by its fabric finishing emission factor and VOC emissions for each finish used that day will be recorded. A day will consist of a 24 hour period starting at 7:00 AM on one day and ending at 7:00 AM on the next day. See attached Table E for recordkeeping format.
  - C. Fabric Dyeing - Brittany will track the usage of dye materials containing VOC on a daily basis. See attached Table F for recordkeeping format.

This approval pertains only to the air quality control aspect of this proposal and does not negate the responsibility of the owners or operators to comply with other applicable State, local, or Federal laws and regulations.

Should there be any differences between the application materials and this approval letter, this approval letter shall govern. All notification and reporting requirements contained herein shall be directed to the Department of Environmental Protection, Southeast Region, Division of Air Quality Control, unless otherwise specified.

Failure to comply with any of the above stated provisions will constitute a violation of the "Regulations" and can result in the revocation of the APPROVAL granted herein. Any subsequent changes to the facility, as described in this letter or in Plan Application No. 4P92012 must be approved in writing by the Department prior to installation.

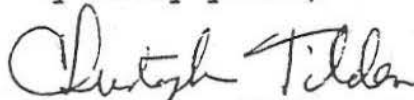
Should the construction, substantial reconstruction, alteration or operation of said facility violate any provisions of 310 CMR 7.00, the person owning, leasing, operating or controlling said facility will be subject to enforcement pursuant to Massachusetts General Laws, Chapter 111, Section 142A and B, Chapter 21A, Section 16.

The Department has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Environmental Affairs, for air quality control purposes, was not required prior to this action by the Department. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and Regulation 301 CMR 11.00, Section 11.03, provide certain "Fail-Safe Provisions" which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report at a later time.

This Approval is an action of the Department, you have a limited right to appeal. Please refer to the enclosed "APPEAL" information.

Should you have any questions pertaining to this APPROVAL, please contact Seth Pickering at the Regional Office at (508) 946-2776.

Very truly yours,



Christopher Tilden, P.E.  
Regional Engineer for Waste Prevention



4P92012

BRITTANY DYEING AND PRINTING CORPORATION  
FABRIC DYEING SOLUTION DAILY RECORDKEEPING LOG  
TABLE C

MATERIAL ID	% VOC BY WEIGHT	% SOLIDS BY WEIGHT	LBS VOC PER LB SOLID

4P92012  
BRITTANY DYEING AND PRINTING CORPORATION  
FABRIC FINISHING DAILY VOC EMISSION RECORDKEEPING LOG  
TABLE E

DATE:

FINISH ID	GALLONS OF FINISH APPLIED	LBS OF VOC PER 100 GALS FINISH	LBS OF VOC EMITTED	YTD TOTAL
<hr/> <b>TOTALS</b>				

4P92012  
BRITTANY DYEING AND PRINTING CORPORATION  
CLEANING MATERIAL DAILY VOC EMISSION RECORDKEEPING LOG  
TABLE G

DATE:

CLEANING MATERIAL ID	LBS OF RAW MATERIAL USED	%VOC BY WEIGHT	LBS OF VOC EMITTED	
TOTALS				YTD TOTAL