



The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

Western Region

486 Dwight Street, Springfield, Mass. 01103

418-784-1100

April 16, 1991

DANIEL S. GREENBAUM
Commissioner

JOHN J. HIGGINS
Regional Director

Mr. William F. Aloisi, Jr.
Environmental Manager
Erving Paper Mills
P.O. Box 38
Erving, Massachusetts 01344

Re: PVAPCD - Erving
310 CMR 7.18 (17) - Reasonably
Available Control Technology
(RACT) Implementation Plan

CONDITIONAL APPROVAL AMENDMENT

Dear Sir:

The Department of Environmental Protection, Pioneer Valley Air Pollution Control District ("Department") issued to Erving Paper Mills (EPM) on October 16, 1990 a conditional approval regarding EPM's Reasonably Available Control Technology (RACT) Implementation Plan to achieve compliance with Regulation 310 CMR 7.18(17). This conditional approval regulated EPM's use of volatile organic compound (VOC) containing solvent wash, for removing water insoluble residues from the paper machine screens and felts.

The Department's conditional approval ensured that EPM process all contaminated paper stock slurry through a series of mechanical stock cleaning devices located in the Nucel Plant before the slurry was introduced onto the paper machines. This minimized the subsequent need to use the solvent wash. However, as written, the conditional approval unnecessarily prohibited EPM from using the paper machines when the stock cleaning devices (ie. the Nucel Plant) were not in operation. There are cases where these stock cleaning devices would not need to be used, and which would result in no additional VOC emissions to the atmosphere, such as while utilizing uncontaminated paper stock (designated as "pulp subs" by EPM).

Therefore, based on the foregoing, the Department amends the October 16, 1990 conditional approval by replacing provision 5 and provision 6, and by adding provision 17, as follows:

5. EPM will not allow the Nucel Plant to operate if the following stock cleaning devices are not in operation:
 - a) side hill washers
 - b) forward cleaners
 - c) reverse flow cleaners

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6. EPM will not allow the Nucel Plant to operate if the following stock cleaning devices are out of service for greater than the following number of hours per year on a rolling 12 month average basis:
- a) coarse screen - 24 hours/year
 - b) flotation unit - 48 hours/year
 - c) fine screens - 24 hours/year
17. EPM will process all contaminated paper stock through the Nucel Plant stock cleaning devices. Only uncontaminated paper stock, currently designated "pulp subs" by EPM, is allowed to bypass the Nucel Plant cleaning devices.

All other provisions of the October 16, 1990 conditional approval remain in effect except as specifically modified by this Conditional Approval Amendment.

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

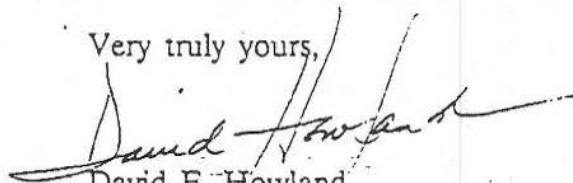
Please be advised that this RACT Determination under 310 CMR 7.18 (17) -Reasonably Available Control Technology is a revision to the Massachusetts State Implementation Plan (SIP) and as such, must be submitted for approval to the USEPA as a source specific SIP revision.

An Environmental Notification Form, for air quality purposes, was not required for this action since it is categorically exempt pursuant to the Regulations Governing the Preparation of Environmental Impact Reports adopted by the Secretary of Environmental Affairs.

This Conditional Approval Amendment is an action of the Department. There are limited rights of appeal. For a description of these rights, read the enclosure "APPEAL RIGHTS".

If you have any questions regarding this Conditional Approval Amendment, please do not hesitate to contact John Kirzec or Craig Goff of the Western Regional Office.

Very truly yours,



David E. Howland
Regional Engineer
Bureau of Waste Prevention
Western Region

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cc: Walter Sullivan, DEP, One Winter Street, Boston, MA 01208