UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

February 3, 2016

James M. Knott, Sr.
Riverdale Mills Corporation
130 Riverdale Street
Northbridge, MA 01534

Re: Clean Air Act Reporting Requirement

Dear Mr. Knott:

The United States Environmental Protection Agency ("EPA") is evaluating whether Riverdale Mills Corporation ("Riverdale Mills") is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act at its facility located at 130 Riverdale Street in Northbridge, Massachusetts ("the facility").

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

In particular, EPA is evaluating the facility's compliance with four federal standards under the authority of the CAA:

1) The National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines ("RICE NESHAP"), found at 40 C.F.R. Part 63, Subpart ZZZZ;

2) The New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines ("CI ICE NSPS"), found at 40 C.F.R. Part 60, Subpart IIII;

3) The New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines ("SI ICE NSPS"), found at 40 C.F.R. Part 60, Subpart JJJJ; and

4) The National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers, ("Boiler NESHAP"), found at 40 C.F.R. Part 63, Subpart JJJJJJ.

Reporting Requirement

1) Provide the information requested in each sub-paragraph below for all stationary internal combustion engines that you own and/or operate at the facility. (Note: for the purposes of this reporting requirement, stationary shall mean any and all engines that remain, or have remained in the past, in the same location for 12 consecutive months or more).

a. The number of stationary internal combustion engines;
b. The designation and location of each engine;
c. The purpose of each engine (e.g., to provide mechanical power, to provide primary electrical power, emergency generators, fire pumps, etc.);
d. The manufacturer, model number, and serial number of each engine;
e. The month, day, and year of manufacture of each engine;
f. The month, day, and year of purchase (the date when a binding contract was in place to purchase each engine);
g. The month, day, and year of installation of each engine;
h. The ignition type for each engine (i.e., spark or compression);
i. The type and quantity of fuels burned in each engine for calendar years 2013, 2014, and 2015;
j. The maximum output capacity of each engine (in brakehorse power, horsepower and kilowatts);
k. The displacement value of the cylinders in each engine (liters/cylinder);
l. The number of hours of operation of each engine in calendar years 2013, 2014 and 2015;
m. The dates you replaced the oil and oil filter for each engine since May 3, 2013;
n. The dates you inspected the air cleaner and all belts and hoses associated with each engine since May 3, 2013;
o. Whether or not each engine has an open or closed crankcase ventilation system. For each engine with an open crankcase ventilation system, provide information on whether the engine is equipped with an open crankcase filtration emission control system (e.g., properly functioning "breather cap" or some other type of device);
p. Whether or not each engine is equipped with a non-resettable hour-meter; and
q. Whether or not you have a "Certificate of Conformity" for each engine provided by the manufacturer of the engine. Provide copies of each certificate to EPA as part of this response and indicate which certificate is associated with which engine.

2) For any engines owned and/or operated by the facility that have not remained in the same location for 12 consecutive months or more, identify these engines in your response. Indicate how often you move these engines and describe the reason for moving these engines.

3) For all of the stationary internal combustion engines described in your response to Question 1 above, indicate whether you submitted to EPA and/or MassDEP any of the following documents. If you answer "yes" to any sub-paragraph below, provide copies of each document:

a. Initial notifications pursuant to 40 C.F.R. Parts 63 or 60, as applicable;
b. Notifications of intent to test pursuant to 40 C.F.R. Parts 63 or 60, as applicable;
c. Initial performance test reports or other initial compliance demonstrations pursuant to 40 C.F.R. Parts 63 or 60, as applicable;
d. Notifications of compliance status pursuant to 40 C.F.R. Part 63, as applicable;
e. Percent load reports pursuant to 40 C.F.R. Part 63, as applicable;
f. A site specific monitoring plan pursuant to 40 C.F.R. Parts 63 or 60, as applicable;
g. Performance evaluations of the continuous parameter monitoring systems (e.g., the temperature monitors measuring temperature at the inlet to the oxidation catalysts associated with the engines) pursuant to 40 C.F.R. Part 63, as applicable; and
h. Semiannual or annual compliance reports pursuant to 40 C.F.R. Parts 63 or 60, as applicable.

4) If the facility has any boilers, provide the following information for each boiler. (Include any boilers currently in use or that have been taken out of service since 2010):

a. The name of the manufacturer, model number, and rated capacity of the boiler (mmBTU/hr);
b. The date the boiler was purchased;
c. The date the installation of the boiler was completed;
d. The date the boiler began operating;
e. The date the boiler was taken out of service (if applicable);
f. The types and annual amounts of fuel burned by the boiler from January 1, 2012 to December 31, 2014:
g. The dates of any tune-ups performed on the boiler pursuant to the boiler NESHAP;
h. Whether or not an energy assessment was performed pursuant to the Boiler NESHAP;
i. Whether you have submitted a notification of compliance status to EPA and/or the MassDEP pursuant to the Boiler NESHAP; and
j. Whether you have performed any performance tests on the boiler pursuant to the Boiler NESHAP

Be aware that if Riverdale Mills does not provide the information required in this Reporting Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for

providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Susan Studlien, Director
Office of Environmental Stewardship
US EPA Region 1
Mail Code OES04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912
Attn: Tom McCusker

If you have any questions regarding this Reporting Requirement, please contact Tom McCusker at (617) 918-1862, or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

cc: Giles Steel-Perkins, MassDEP