

At the request of the Town of South Hadley, Weston & Sampson provided a review of the Special Permit and Stormwater Permit application for the proposed expansion of the E Ink Corporation (E Ink) facility at 7 Gaylord Street in South Hadley. Weston & Sampson issued a memorandum summarizing their findings and included a number of inquiries for additional information from E Ink.

This document, and the attachments listed comprise E Ink’s response to the March 11, 2022 Weston & Sampson memorandum as well as to issues raised by the South Hadley Planning Board and South Hadley Conservation Commission. E Ink has provided a separate response to the Town of South Hadley Fire Department’s inquiries. See “20220325-SHFD Response”.

### **REVIEW FINDINGS FOR STORMWATER**

Massachusetts Stormwater Standards:

- Standard 1 – Standard has been met.
- Standard 2 – Standard has been met.
- Standard 3 – Standard has been met.
- Standard 4

**Response:** Updated information has been included in the revised Stormwater Management Report (SMR):

- The stormwater quality volume has been updated to include a 1-inch rainfall depth.
- Calculations have been provided for the stormwater quality units selected for this project.
- Third party testing for TSS removal rates for the stormwater quality units have been included.
- The reference to LeBaron has been removed from the snout unit on the catchbasins.
- Standard 5

**Response:** We have clarified that this property is considered a site with a land use with a higher potential pollutant load. (LUHPPL)

- Standard 6 – Standard has been met.
- Standard 7 – Standard has been met.
- Standard 8 - Standard has been met.
- Standard 9

**Response:** Operations and Maintenance narrative was included in Section 2 of the (SMR).

- Standard 10

**Response:** No known illicit discharges to the stormwater drainage system. Standard has been met.

### **LOW IMPACT DEVELOPMENT**

No comments to address

### **REVIEW STANDARDS FOR THE SPECIAL PERMIT**

#### **Comment:**

- (1) *The applicant's special permit modifies the existing manufacturing facility usage by the inclusion of a tank farm for chemical storage. The additional chemical storage and processes are presented in a "Pigment Functionalization Process Overview Diagram." We recommend clarification on the new tank farm and chemical loading/unloading are including:*
- a. *There are eight rectangular features shown adjacent and northeast to the proposed storage tanks that are not labelled. Please label these features to indicate their nature.*

**Response:** The eight rectangular boxes indicate pumps to move the chemical product. They are now clearly identified in the revised plan set, drawing A-0108.

- b. *Please provide more details of the secondary containment system around the tanks. At a minimum this should include the surface type, grading, berms and drain (if any)*

**Response:** A detailed plan of the area, including a section through the area has been developed to help clarify the configuration of the secondary containment. This is show in drawing A-0108.

- c. *Secondary containment is present at the truck loading/unloading area. What will be the connection of hosing or pipes to the new tank? If piped with a hose connection no secondary containment is required. Otherwise, please describe the secondary containment planned and provide sizing calculations.*

**Response:** The connections from the delivery vehicle to the pumps will be a hose connection. No secondary containment is required. However, E Ink will use a drip pan beneath the tanker hose connection. In addition, E Ink's tanker pad will have a trench drain leading to the concrete tank for secondary containment. See drawing 3.0 and drawing A-0108.

- d. *Note 9 on Drawing Sheet C 3.0 states that hoses shall be taken inside the building to be drained, cleaned, and sealed for next use. Please indicate where the hoses will drain too. What controls are in place for the cleaning process for the hoses? Please clarify how rinsate water will be managed.*

**Response:** The hose will be blown empty with nitrogen. The hose will be closed with a valve and capped once the delivery has been completed. The hose will then be brought into the facility to be fully drained into a containment container in that will be disposed of by a third party carrier once filled, per current hazardous waste regulations. No rinsate water will be used.

- e. *In the event of a spill to the "Unloading Spill Containment Area," will the area be cleaned prior to opening the valve to the stormwater system to prevent residual chemicals from entering the stormwater system? How will wash water be handled if it is generated as part of the cleaning process?*

**Response:** The connection to the stormwater system from the unloading area has been eliminated from the design. Any minor spill will be trapped in the containment pan below the hose connections. There will be a spill kit onsite in case of a small spill cleanup event. In the event that a spill is larger than can be contained in the pan, it would flow into the emergency containment tank. This tank would then be cleaned by a third-party vendor who would transport all the liquids off site and dispose of properly.

- f. *Text on the site plan C-3.0 notes "Tank Farm (see Arch. Plans)." Please provide referenced architectural plans.*

**Response:** Detailed plan of the tank farm including a section through the area will be included in the updated plan set. See drawing A-0108.

- g. *Text within the tank outlines is not legible on PDF, please provide legible labeling.*

**Response:** The text is now legible on the revised detailed plan of the tank farm for clarity. See drawing A-0108.

- h. *We recommend that Sheet C-3.0 include an alternate plan view excluding the truck vehicle to show fixed structures only. It is unclear if the rectangular area outside the vehicle outline is a separate concrete/asphalt pad or other structure.*

**Response:** The outline of the truck has been removed from the alternate plan view for clarity. The pad below the truck is concrete. See drawing 3.0.

**Comment:**

(2) *Be suitable to the surrounding neighborhood and the "Land Use Area" in which it is located. Land Use Areas are identified and described in the section of South Hadley's Master Plan entitled "Land Use Area Vision Statements" (pages 1-10 through 1-19). In making this determination, the Planning Board shall take into consideration any guidance provided by the land use goals articulated in South Hadley's Master Plan, goals articulated in South Hadley's open space and recreation plan, and input from relevant boards, Town officials, and the public.*

**Response:** E Ink has been a good neighbor to the surrounding community since occupying the site in 2008. It has preserved the character of the area and improved the streetscape with additional landscaping. For example, in 2019, The South Hadley Falls Neighborhood Association recognized E Ink for "thoughtful attention to landscaping at the entrance to your offices. You have made a significant improvement to our neighborhood."

The proposed construction will improve the aesthetic quality of the site with a state of art processing facility. In the design of the building, E Ink has considered input from the Planning Board, Conservation Commission, Fire Department, Building Inspector, and the public.

**Comment:**

(3) *Be compatible with existing uses and uses allowed by right in the neighborhood, Land Use Area, and zoning district.*

**Response:** The site is located in the Industrial B Zoning District.

E Ink's processing facility is consistent with the uses allowed on this district. The intention of the proposed construction is to expand and improve operations within the pigment facility. In the new construction, E Ink will continue its practice of using clean design principles in order to produce the high quality displays demanded by its customers.

**Comment:**

(4) *Be compatible with the existing character of the neighborhood and Land Use Area, and/or zoning district. "Character" shall be understood to include prevalent patterns of: site design; setbacks from property lines; amount and location of parking; amount, type, location and quality of open spaces and landscaped areas; amount, type, and location of impervious surfaces; distances and relationships between buildings; density of building(s) relative to land area; building massing; architectural style and detailing; materials; buffering from adjacent uses; traffic volume and timing; noise; odors; and light*

**Response:** The new Pigment Facility will be compatible with the existing character of the neighborhood.

The site design will improve traffic flow by removing the current backing up of trucks on the street and moving loading and unloading activities on to the site.

The building addition will maintain and increase the existing setbacks. It will create more open areas and landscaped areas. The existing parking lot will remain as is without expansion. The amount of impervious surface will be reduced.

The building massing will be lessened from the previous three story Administration Building. The architectural style and detailing will be consistent with the adjoining facility. The facade will be a combination of contemporary materials, smooth and textured metal panel and a matching brick veneer to echo more traditional materials.

In order to buffer the project from adjacent uses as well as the street, landscaping was increased along the street, roof louver screens are employed to remove sight lines to mechanical equipment and tiered canopies, fencing and perforated metal panels shield the Tank Farm from view. See 3D renderings 2021-35-A0411-B and 2021-35-A0410-B.

**Comment:**

(5) *Be suitable for the property on which it is proposed, considering the property's, scenic, cultural and historic significance, and its ability to be buffered or screened from neighboring properties and public roads*

**Response:** The project is suitable for the property on which it is located, given the industrial history of Gaylord Street and current manufacturing uses.

As discussed above at Comment (4), the proposed Pigment Facility represents an improvement to the neighborhood. Facility activities will be screened from neighboring uses and public roads. As part of this package, we have included the requested architectural plans. See 3D renderings 2021-35-A0411-B and 2021-35-A0410-B.

**Comment:**

(6) *Provide safe access for fire, police, and other emergency vehicles. The applicant has engaged with the Town Fire Department. These files are included in the peer review and provide additional useful information on the nature of the proposed tank farm. We have no further comments on this issue currently.*

**Response:** No question was presented in the comments. E Ink is committed to working with local public safety officials to address any concerns they may have about safe access to the property.

**Comment:**

(7) *Provide adequate water, drainage and waste disposal systems without causing significant harm to any natural water system or overloading any public water, drainage, or sewer system, or any other municipal facility.*

*Please refer to the stormwater peer review comments related to stormwater handling. The February 4, 2022 letter from IFDesign addresses questions from the Town of South Hadley Planning board regarding the water-quality (i.e., stormwater) unit and coordination with the abutting property for an agreement and easement. The letter notes that E Ink and Fuel Services (an abutter) will coordinate to maintain a stormwater quality treatment unit. The applicant has indicated that “E Ink intends to memorialize the easement after discussions with the Planning Board and Conservation Commission.” We recommend that a written agreement regarding any easements, operations, maintenance and management be ratified prior to permit approval.*

*We request the applicant provide details about the stormwater to be treated by this system and the type of stormwater quality unit for review and confirmation of bylaw compliance.*

**Response:** The stormwater calculations and supporting documentation of the water quality unit is located in the Stormwater Management Report. The entire drainage system will be maintained by E Ink.

E Ink has an agreement in principle with Fuel Services as to the location and obligations, all of which will fall to E Ink, of the proposed water treatment facility. The water treatment facility will benefit both properties. E Ink’s intent is to make sure that both the Planning Board and the Conservation Commission have authorized the location and function of the water treatment facility before executing the easement.

**Comment:**

(8) *Not cause significant traffic congestion, impair pedestrian or bicycle safety, or overload existing roads, sidewalks and trails, considering their current width, surfacing, and condition, and any improvements proposed to be made to them by the applicant.*

*This peer review did not include a review of traffic. The applicant has noted that, by providing a turn radius, the existing configuration includes trucks backing into the driveway to access the loading dock; the proposed new configuration notes that backing into to the driveway will no longer be required. That is, trucks will pull into the driveway of the applicant’s shared driveway rather than needing to back-in from the street. We would note that the shared driveway arrangement does present some risk as E Ink trucks, loaded with hazardous materials, will*

*potentially be maneuvering in the same area with vehicles from the other facility. It is not clear how this risk will be managed.*

**Response:** A 2005 traffic study showed that 1,300 vehicles traveled on Gaylord Street per day. See “Comprehensive-Plan-Figure7-1”. E Ink’s proposed construction will eliminate the current practice of trucks backing into our dock, which obstructs Gaylord Street traffic.

The shared use driveway is approximately 40 feet wide at the street and is not expected to inhibit any vehicle movements for either entity. All tanker delivery drivers are required to have appropriate licensing to ensure safety. E Ink confirmed the delivery area supports an adequate turning radius for delivery trucks. See drawings # C5.0 for E Ink trucks and C5.1 for Fuel Services Trucks

E Ink is committed to working with our neighbor Fuel Services, Inc. to minimize any truck conflicts and crossings. E Ink is in the process of discussing traffic risk and appropriate steps to mitigate any risk with Fuel Services. E Ink will coordinate with Fuel Services to provide appropriate truck traffic signage, as necessary.

Additionally, the low frequency of E Ink deliveries will also reduce risk:

- Fuel Services 15-20 trucks / 10 hour day
  - Average of 1 truck every 30 minutes
- E Ink: 4-6 per day plus up to 1 tanker / 10 hour day
  - Average of 1 truck every 90 minutes

**Comment:**

(9) *Not result in excessive air, water, noise, or light pollution, or create any other public or private nuisance.*

*The applicant has listed a closed loop system with minimal air exposure. We understand that the proposed project will require permit review for air quality. Since our review overlaps with air quality, we offer the following air related questions and comments:*

- a. *What vapor/emissions controls will be in place for the new tank farm? What are the components of this closed loop system?*

**Response:** E Ink will be installing a Regenerative Thermal Oxidizer (RTO) on the roof of the new pigment plant. An RTO is an industrial system that destroys volatile organic compounds (VOCs) in process exhaust air before it pollutes the environment. All normal operational venting of the tanks will be piped directly to the RTO, including the emissions from the operation of the tank farm. The “closed loop system” means that we have sealed process systems not open to air with processes venting from sealed vessels (including the tank farm) running through the RTO.

E Ink will also be working with a 3<sup>rd</sup> party Environmental Consultant to assess its emission control requirements and to assist E Ink with the filing of all required air permits. On December 13, 2021 E Ink and their 3<sup>rd</sup> party environmental consultant met with the MassDEP (virtually) to inform them of E Ink’s expansion and request their guidance on how to proceed with permitting. Additionally, on March 25, 2022, E Ink met (virtually) with MassDEP to discuss all MassDEP permitting requirements.

- b. *Please describe the emissions control system described in the applicant’s Hazardous*

*Waste Material Contingency Plan to include a Regenerative Thermal Oxidizer (RTO) and how vapors from the tank farm or other new processes will be routed to this RTO.*

**Response:** The emission control system includes an RTO to limit process emissions to the atmosphere. Process vessels (including the tank farm) will be maintained under a low level of nitrogen pressure to prevent explosion and venting of these vessels will be carried out by a limited emission venting system that carries any emissions to the RTO unit.

The RTO and a description of how vapors from the tank farm and the process lines in the Pigment Plant are routed to the RTO have been added to E Ink's revised Emergency Response Plan (Doc # 950-1028).

- c. Will air monitoring be performed and will air monitoring data shared with the Town as the system start-up begins? Based on wind direction, residential properties may be within 500 feet of the tank farm. The Hazardous Waste Materials Contingency Plan includes Oxygen and Lower Explosive Limit (LEL) monitors in interior spaces.*

**Response** Our air permit requires us to track our air emissions on a monthly basis and report to MA DEP on a yearly basis to ensure we are below our permitted levels of volatile organic compounds (VOC) and Hazardous Air Pollutants (HAP). If monthly monitoring identifies that we are above our permitted limit, immediate reporting to the MA DEP is required. The RTO unit design is for a minimum of 98% destruction efficiency which will be verified both at startup and through regular testing as required by the regulating authority. As stated previously, process venting, including venting for the tank farm will be routed through the RTO unit to assure thorough emission control.

- d. Does the applicant plan to include vent ports for the 8,500-gallon precast concrete tank? If a limited release of toluene occurred how would this concrete tank be managed to both avoid vapor migration if venting is present or build-up of vapors.*

**Response:** The concrete tank will be naturally vented via the pipe from the tanker pad trench drain, so vapors will not build up in the tank.

In the unlikely event of a spill greater than 5 gallons, E Ink will work with Clean Harbors, a licensed third party hazardous waste disposal company, to clean up the spill (including emptying the concrete tank) within ~24 hours. Typical response time is ~2 hours for onsite presence of Clean Harbors. In the event of such a spill, E Ink will have 24-hour monitoring onsite at the tank location until it is cleaned.

E Ink will install a Lower Explosive Limit (LEL) unit to continuously monitor vapor present in the tank. An LEL is the lowest concentration of a gas or vapor that will burn in air. If vapor level is above 10% LEL, the LEL unit's alarm will trigger, resulting in an automatic shutdown of all potential ignition sources in the area.

- e. Has the applicant performed a Hazardous Building Materials Inventory (HBMI) of the Administrative Building to be demolished? The MassDEP will require under the AQ-06 Construction/Demolition Notification completion of hazardous material survey and abatement during partial demolition/renovation activities.*

**Response:** E Ink had a Pre-Demolition Hazardous Building Materials Survey Report completed on December 3, 2018 by Forbes & Wheeler. In accordance with the guidance provided by our demolition contractor, we completed the asbestos abatement prior to filing the AQ-06 Construction/Demolition Notification. Western Mass Demolition Corporation filed the AQ-06 on March 23, 2022

*f. Please specify any odor controls and air monitoring to be performed during toluene and pigment deliveries.*

**Response:** All normal operational venting of the toluene tank will be piped directly to the RTO.

E Ink has prepared a delivery process that limits the release of these materials. This process will be memorialized in an E Ink Standard Operating Procedure (SOP). The SOP will detail the two person process, an E Ink employee and the delivery personnel, as described below.

1. E Ink sign paperwork indicating that tanker is connected to the correct fill pipe.
2. Ground and bond all hose connections with grounding indicator.
3. Driver pumps fluid into our tank.
4. After finish pumping fluid into the tank, will blow nitrogen through to tank.
5. Shut off valve from tanker to hose.
6. Shut off valve at tanker end of the hose.
7. Break connection at tanker with drip pan underneath. Cap the hose.
8. Walk down hose toward pump.
9. Shut valve at pump.
10. Shut off valve at pump end of hose.
11. Break connection at pump with drip pan underneath. Cap the hose.
12. Bring hose inside to drain to waste container.

E Ink will install an LEL meter at the Tank Farm. This will ensure that there are no vapors over the LEL limit of 10% at any time.

*g. Does the applicant propose an inspection plan and schedule for tanks storing hazardous wastes (310 CMR 30.686 and 310 CMR 30.696)?*

**Response:** The tank farm will not contain hazardous waste. The project does not currently include any additional hazardous waste tanks. If new hazardous waste tanks are installed elsewhere, E Ink will follow all applicable regulations for those tanks storing hazardous wastes, including all inspection requirements. E Ink has engaged a 3<sup>rd</sup> Party Environmental Consultant to assist E Ink with complying with all hazardous waste tank regulations.

*h. Does the applicant plan to submit a written assessment to MassDEP attesting that proposed tank system has sufficient structural integrity and is acceptable for the storing of hazardous wastes (310 CMR 30.693(1))?*

**Response:** The tank farm will not contain hazardous waste. The project does not currently include any additional hazardous waste tanks. If new hazardous waste tanks are installed elsewhere, E Ink will follow all regulations for tanks storing hazardous wastes. E Ink will also be using a 3<sup>rd</sup> Party Environmental Consultant to assist E Ink with complying with all hazardous waste tank regulations



- i. *Does the applicant plan to perform tightness tests prior to putting the tanks into use (310 CMR 30.693(5))?*

**Response:** E Ink will perform tightness tests prior to putting all tanks into use.

**Comment:**

*(10) Not degrade the scenic, rural, or historic character of the Town with structures or other lot features which are deemed visually objectionable in light of prevailing community as reflected in the goals articulated in South Hadley's Master Plan.*

**Response:** The Proposed Facility will be an improvement to the site by removing an abandoned building and replacing it with a visually attractive and complimentary structure that is consistent with the character of the neighborhood.

**Comment:**

*(11) Be consistent with the South Hadley Master Plan, provided that the Comprehensive Plan provides legally sufficient guidance and that the applicable provision of the Master Plan is not inconsistent with any specific provision of this bylaw*

**Response:** As part of the Comprehensive Plan in the South Hadley Falls Neighborhood there is a Vision Statement to reuse and rehabilitate vacant mill buildings. E Ink is accomplishing this goal by re-purposing the site of the former Administration Building with a state of the art High Technology Facility.

**Comment:**

*(12) Comply with applicable criteria for site plans under § 255-148.*

*Bylaw items 10, 11 and 12 will require a set of architectural plans for review. The requested architectural plans will provide information needed to review the visual nature of proposed construction and review criteria of § 255-148.*

**Response:** As part of this package, we have included the requested architectural plans

- 3D renderings 2021-35-A0411-B and 2021-35-A0410-B
- Ground floor plan: drawing A-0106
- 1<sup>st</sup> floor plan: drawing A-0107
- Building Section: drawing A-0501
- Tank Farm Section: drawing A-0108

### **ADDITIONAL INQUIRIES**

Additional issues were raised during the Planning Board and Conservation Commission meetings. We respond to those issues below.

1. *What inspections will be required for the new facility?*

**Response:** E Ink performs a number of inspections. Some are performed by E Ink employees, some by 3<sup>rd</sup> parties, some in combination. E Ink has 2 full-time EH&S professionals onsite in South Hadley to ensure proper regulatory compliance and safety. Additionally, we retain a third party environmental health & safety consultant to ensure that we conduct all appropriate inspections. These inspections will continue, without any additional burden on the Town of South Hadley or its personnel. A list of current inspections is enclosed with our documentation package "Inspection List 03 21 2022".

2. *What permits does E Ink need to operate the pigment facility?*

**Response:** See “\_Permit List 02 4 2022\_ Revised”

3. *Describe the safety measures in place to assure that the tanks are not subject to damage from extreme weather events or other unforeseen events.*

**Response:** Tank farm tanks are highly regulated to provide common standards for safe operation the two major categories of regulation are:

- NFPA 30 FLAMMABLE AND COMBUSTIBLE LIQUIDS CODE
- API 621 code DESIGN AND CONSTRUCTION OF LARGE WELDED, LOW-PRESSURE STORAGE TANKS

A summary of these regulations is presented in the attached PowerPoint presentation “Tank\_Specifications\_Ensuring\_Structural\_Integrity”.

E Ink’s tanks will conform with these safety regulations. Additionally, E Ink will implement safety measures to protect the tank farm. See 20220325-SHFD Response.

4. *Provide an updated Emergency Contingency Plan that includes the new pigment facility and tank farm and a description how employees are trained to the Plan.*

**Response:** Please see E Ink’s Emergency Contingency Plan. The Plan includes a list of E Ink emergency contacts and the process for updating the Plan and the Town of South Hadley should a contact leave the company.

Each South Hadley employee is trained to the Plan as part of their orientation. Thereafter, employees receive yearly training on the Plan. All of E Ink’s training logs are maintained on our company intranet and /or in hard copy. Managers are responsible for assuring that their employees attend all appropriate trainings, including the Emergency Contingency Plan Training.

5. *Response to CAI Danvers incident.*

**Response:** See CAI/Danvers Incident PowerPoint Presentation. This presentation also includes a discussion of how toluene is used safely in a controlled environment.

6. *Assure that BATTERY Brook isn’t significantly impacted by salt runoff from snow disposal at the E Ink facility.*

**Response:** Our updated snow management plan mitigates this concern and is included in the updated Storm Water Report.

7. *Describe how wash water will be managed in the tanker unloading area.*

**Response:** The plans have been updated to eliminate any connection between the tanker pad and the stormwater drain system. See 2021-35-A0108-D.

8. *Can the trench drain and pipe to the emergency containment tank support adequate drainage volume to prevent overflow?*

**Response:** Yes, a 12” pipe can support adequate drainage volume to prevent tanker pad overflow.

9. *Please describe your choice of the UL-142 tank plus diked area vs. UL 2085 tank.*

**Response:** E Ink has selected a UL-142 tank, which is a single wall tank, the tanks will be located in a diked area for secondary containment, this is code compliant. Further description of the secondary containment is included below. There is no requirement to use a UL 2085 double wall tank, while it provides its own secondary containment so no dike would be needed, it would still require vehicle impact protection. The use of UL-142 tanks with a diked area for secondary containment also provides coverage for a leak at the tank valve, which isn't included in the UL 2085 double wall tank system. Hence, this system is better than use of UL 2085 by itself.

The secondary containment at the tanks is by means of a 4 foot high, 12 inch thick reinforced concrete wall with a floor of 12 inch thick reinforced concrete slab. All surfaces are epoxy coating to resist chemicals. There will be weather protection from a metal canopy supported by a steel tube structure. A 2 hour fire rated reinforced concrete masonry unit wall will be provided at the 3 Mill Building for additional protection.

#### Tank Farm Information

Largest Tank - 14,700 gallons @ 110% or 16,170 gallons

Actual Volume Contained – 1050 sf x 4 feet = 4200 cf or 31,416 gallons

Drainage channels shall subdivide each diked area containing two or more tanks, in order to prevent minor spills from a tank from endangering tanks within the diked area. The draining channels shall be located between tanks to take full advantage of the space.

The Fire Protection System will be a Foam Water System for Dike Protection activated by flame detection. Non-Fluorinated Foam will be used. The pipe system will be dry until activated.

*10. What permits does E Ink need to operate the pigment plant?*

**Response:** E Ink's comprehensive permit list is captured in “\_Permit List 02 4 2022\_ Revised”. This list was reviewed with the MassDEP on at a virtual meeting on March 25, 2022.

#### LIST OF CITED AND PROVIDED DOCUMENTS

- Updated Storm Water Management Report
- 3D renderings 2021-35-A0411-B and 2021-35-A0410-B
- Ground floor plan: drawing A-0106
- 1<sup>st</sup> floor plan: drawing A-0107
- Building Section: drawing A-0501
- Tank Farm Section: drawing A-0108
- South Hadley Traffic Study Figure 7-1
- Revised E Ink Emergency Contingency Plan
- CAI-Danvers Incident PowerPoint Presentation
- 20220325-SHFD Response
- \_Permit List 02 4 2022\_ Revised
- Inspection List 03 21 2022
- Tank\_Specifications\_Ensuring\_Structural\_Integrity Power Point Presentation