

STATEMENT OF BASIS for B-WAY CORPORATION

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 61023 / Permit Activity Number: BOP190001

I. FACILITY INFORMATION

B-Way Corporation is located at 6 Litho Road, Lawrence Township, Mercer County, NJ 08648' and consists of printing and roll coating of metal, plastic and hybrid pails, cans and miscellaneous containers. The facility is owned and operated by B-Way Corporation.

The facility is classified as a major facility based on its potential to emit 78.4 tons per year of volatile organic compounds (VOC) to the atmosphere.

This permit allows individual hazardous air pollutant to be emitted at a rate to not exceed: 850 pounds per year of Ethyl acrylate, 5,060 pounds per year of Ethylbenzene, 4,000 pounds per year of Isophorone, 438 pounds per year of Manganese compounds, 11,200 pounds per year of Methyl isobutyl ketone (MIBK), 406 pounds per year of Phenol and 15,800 pounds per year of Xylene.

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: As part of the coating operations there are six line coaters, two side stripe pail lines, two spray booths for mixers, two line printing presses, one metal grinder, four mixers at coating lines, seven small natural gas ovens with less than 2.0MMBTU/hr heat input, and one natural gas 7.43 MMBTU/hr HHV - Heater for Makeup Air Unit.

Table 1 - Operating Permit Revision History (located at the end of this document) provides a summary of all the changes that have been incorporated into the operating permit through seven-day notice changes, administrative amendments, minor modifications, or significant modifications since the approval of the initial operating permit or the most recent renewal thereof. Please refer to the attached explanation sheet for the structure and configuration of conditions of approval, included in the Facility Specific Requirements section of this permit.

A Facility-Wide Risk Assessment was conducted as part of the review of this permit application and health risk was determined to be negligible / acceptable to the Department consistent with NJDEP Technical Manual 1003.

This is a Permit Renewal and includes the following changes:

- 1) Update FC section requirements of the compliance plan in the permit.
- 2) Update Section B, General Provisions and Authority, of the Permit Text.
- 3) Remove the inapplicable Submittal/Action from the compliance plan at emission unit U1, operating scenario OS0, References #31, #32, #33, and #34.
- 4) Revise the language under Monitoring Requirement, Recordkeeping Requirement and Submittal/Action Requirement for stack testing from "See stack test details elsewhere in the OS SUMMARY in OS Summary," to "See stack testing SUMMARY in OS Summary." throughout U1.
- 5) Add the following Requirement at U1, OS0, Ref#8:

"CEMS/COMS REQUIREMENTS SUMMARY

The Permittee shall operate CEMS according to the approved certification and in compliance with daily, quarterly, and annual quality assurance requirements. The CEMS shall include continuous

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monitoring of all necessary parameters (e.g. oxygen, moisture, temperature, flow rate) to allow the required corrections to be applied to demonstrate compliance with the emission limits.”

- 6) Add “Keep manufacturing design construction documents.” at Recordkeeping Requirement under U1, OS0, Ref#29.
- 7) Add “Keep records of the shutdown process available for review at the request of the Department.” at Recordkeeping Requirement under U1, OS0, Ref#30.
- 8) Remove from Applicable Requirement the language “from operating permit application, BOP130002” at U1, OS1, Ref#4.
- 9) Add Record Keeping Requirement” manual logging of parameter or storing data in a computer data system upon occurrence of event” at U1-OS18, Ref#4.
- 10) Make following revisions to U4, OS0, Ref#8 for hours of operation:
 - a) Revise the language under Applicable Requirement from “Maximum hours of operation per year limit, from permit renewal, BOP090001” to “Maximum annually hours of operations in any 12 consecutive month period.”
 - b) Revise to Monitoring Requirement from “Monitored by hour/time monitor continuously.” to “a consecutive 12-month period (rolling 1-month basis)”
 - c) Revise the Record Keeping Requirement from “Recordkeeping by manual logging of parameter each month during operation” to “The hours during any one month shall be added to any 12 consecutive months, computed by adding the hours in a given month to that calculated in the preceding 11 months.”
- 11) Delete from Applicable Requirement “Maximum emissions rate from permit renewal, BOP090001” at U4-OS1 Ref#2, Ref#3, Ref#4, and Ref#5.
- 12) Include existing PM-2.5 emissions equal to PM-10 emissions to U4-OS0 at Ref#6, and U4-OS1 at Ref#6 as these are required to be in the permit after the New Jersey air permitting rules were updated in December 9, 2017.

There are no proposed changes to air emissions as a result of this renewal.

IV. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility’s operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility’s continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

For surface coating operation U1, the facility monitors the coating usage (gal/yr) and VOC and HAP content (lb/gal) of all surface coating formulations as surrogates for the long-term (TPY) emission limits for VOC and HAPs. For each surface coating formulation, the facility monitors the coating usage (gal/hr), VOC content and HAP content as surrogates for the short-term (lb/hr) emission limits for VOC and HAPs.

3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
 - Equipment size and capacity limitations,
 - Subject equipment being permitted at the maximum rated capacity,
 - There is no specific state or Federal standard that applies to this piece of equipment,
 - Not a pollutant of concern for this piece of equipment,

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- Agreements with EPA on the frequency of testing and monitoring for combustion sources.

V. APPLICABLE STATE AND FEDERAL RULES

The facility is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

The Greenhouse Gas (GHG) emissions from this facility are 9,256 TPY CO₂e and there is no GHG emissions increase. This renewal is not subject to PSD rules at 40 CFR 52.21.

VI. FACILITY'S COMPLIANCE STATUS

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

The facility has submitted a timely and complete application to renew their operating permit and an application shield is in effect.

This operating permit also includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Also, prior to the expiration of the five-year period, the facility will be required to apply for a renewal of this operating permit, at which time the Department will evaluate the facility and issue a public notice with its findings.

VII. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

Table 1 - Operating Permit Revision History

New Jersey Department of Environmental Protection

Operating Permit Revision History

B-WAY CORPORATION PI 61023

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP180001	Minor Modification	<p>This Permit Modification included the following changes:</p> <ol style="list-style-type: none"> 1. Incorporate mixing room at emission unit U3, into the emission unit U1- as follows: U1-OS21-E1600, OS22-E1700, OS23-E1800, and OS24-E1900. 2. Capture all the emissions from the mixing operations by the CD1 (Thermal Oxidizer) 3. Delete the emission unit U3 and its assigned operating scenarios (OS), Equipment (E), and emission point (PT), U3-OS1-E16, OS2-E17, OS3-E18 and OS4-E19 with the PT3 from the permit. 4. Update applicable rules to U1. 5. This modification resulted in facility-wide potential emissions decrease of 3.03 tons per year of volatile organic compounds, and 0.965 tons per year of HAPs. 	5/13/2019
BOP160001	Significant Modification	<p>This Permit Modification includes the following changes: Based on Stack test data (2015), the Side Stripe coating operation at U1-OS17 is being modified as follows:</p> <ol style="list-style-type: none"> 1. Decrease the capture efficiency to 60% from 100% of the Side Stripe coating operation. 2. Change the hourly coating rate from 1.2 gal to 0.4 gal, 3. Reduce the annual coating usage from 7,000 gal/yr to 2,800 gal/yr 4. Increase the annual operation, from 5,840 hours to 7,000 hours 5. Revise the allowable VOC emission to 0.486 lb/hr (combining fugitive emission of 0.452 lb/hr and 0.034 lb/hr after oxidizer control) 6. Increase the annual VOC emission limit by 0.7 tons. 	9/19/2017
BOP170001	Administrative Amendment	<p>This Permit Modification includes the following changes: Change the name of the company from BWAY Packaging to B-Way Corporation, replace Facility's Responsible Official and update other facility contacts.</p>	6/28/2017

FACILITY NAME (FACILITY ID NUMBER)
BOP050001

Activity Number assigned by the Department

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit Number assigned by the Facility

Brief description of emission unit

Emission Unit: U40 Sewage Sludge Incinerators
Operating Scenario: OS Summary

OR OS2 Fluidized Bed Incinerator

OS Summary lists all rules and requirements that apply to an emission unit. An emission unit may contain one or more pieces of equipment and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules and requirements that apply to a scenario. An operating scenario represents various ways (or scenarios) a piece of equipment is permitted to operate.

Item Number

Description of applicable requirement

Monitoring method to ensure compliance

Recordkeeping to show facility's compliance

Actions and submittals required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for applicable requirement

Rule citation for monitoring requirement

Rule citation for recordkeeping requirement

Rule citation for submittal/ action requirement

Explanation Sheet for Facility Specific Requirements