

STATEMENT OF BASIS for Frazier Industrial Corp.

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 26188 / Permit Activity Number: BOP190002

I. FACILITY INFORMATION

Frazier Industrial Corp. is located at 91 Fairview Avenue, Long Valley, NJ 07853, Morris County and consists of an industrial shelving facility. The facility is owned and is operated by Frazier Industrial Corp.

The facility is classified as a major facility based on its potential to emit 31.2 tons per year of volatile organic compounds.

This permit allows individual hazardous air pollutant to be emitted at a rate to not exceed: 0.81 tons per year of Toluene and 9.98 tons 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: three surface coating dipping tanks, 12 open process weld machines, an automatic weld machine, and a diesel fuel fired emergency generator.

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 Refined Risk Assessment was previously conducted on February 1 and April 17, 2018 for modification activity BOP170002 and health risk was determined to be negligible consistent with NJDEP Technical Manual 1003. The Refined Risk Assessment was approved as a Facility-Wide Risk Assessment because it was based on the total VOCs from the facility. Because no changes were made to Air Toxics (including HAPs) emissions or risk parameters since the last risk assessment, a revised Facility-Wide Risk Assessment was not conducted with this permit application.

This is a Permit Renewal and includes the following changes:

- 1) Reduced the Volatile Organic Compound (VOC) coating usage and the annual VOC emissions for the three surface coating dip tanks in Emission Unit U1 OS Summary Ref 4 & 5.
- 2) Added a 4.96 MMBTU/hr diesel emergency generator (general operating permit GOP200001) to Emission Unit U6.

The changes made during this permitting action result in allowable annual emissions changes as follows: Volatile Organic Compounds were reduced by 5.2 tons per year; Nitrogen Oxides were increased by 0.39 tons per year; Carbon Monoxide was increased by 0.05 tons per year.

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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 the diesel emergency generator in Emission Unit U5, the facility monitors hours of operation for testing and maintenance (hr/yr) for the long-term (TPY) emission limits for VOC, NOx, CO, TSP, PM-10, and PM-2.5.

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,
 - 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 facility is also subject to Federal regulations listed below.

MACT Subpart ZZZZ: Stationary Reciprocating Internal Combustion Engines
NSPS Subpart A: General Provisions
NSPS Subpart EE: Surface Coating of Metal Furniture
NSPS Subpart IIII: Stationary Compression Ignition Internal Combustion Engines

The Greenhouse Gas (GHG) emissions from this facility are 49.25 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.

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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

FRAZIER INDUSTRIAL CO PI 26188

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP200001	Administrative Amendment	The following changes were made to the operating permit during this amendment process: - Update responsible official contact (Tim Johns)	6/8/2020
BOP190003	Minor Modification	The following change was made to the operating permit during this modification process: Added three new operating scenarios in Emission Unit U1 OS4-6 for surface coating formulations with VOC exempt solvents. The change made during this permit activity resulted in no emission increases.	8/26/2019
BOP180001	Minor Modification	The following change was made to the operating permit during this modification process: The requirement to use diesel fuel that meets petroleum industry specifications for undyed low sulfur diesel fuel (0.047 wt.% sulfur) was removed from Emission Unit U5 OS Summary Ref. 7. The facility is complying with the more stringent N.J.A.C. 7:27-9.2(b) requirement to use fuel with a sulfur content of \leq 0.0015% by weight in Emission Unit U5 OS Summary Ref. 3.	12/11/2018

BOP170002	Minor Modification	<p>The following changes were made to the operating permit during this modification process:</p> <ol style="list-style-type: none"> 1. Increased the VOC content in Emission Unit U1 OS1-3 Ref. #2 from 3.3 lb/gal to 3.5 lb/gal based on the addition of VOC solvent to the facility's paint coatings; 2. Updated the monitoring, recordkeeping, and submittal/action requirements for the NSPS Subpart EE VOC content limit in Emission Unit U1 OS Summary Ref. #16. <p>The changes made during this permit activity result in an increase of allowable annual emissions of VOC by 2.1 tons.</p>	5/30/2018
BOP170001	Minor Modification	<p>This minor modification updates the following stack parameters:</p> <ol style="list-style-type: none"> 1. Adds new vertical stack emission point PT12 (U1 OS3) for a paint dip tank; 2. Deletes emission points PT3 and PT9; and 3. Corrects the discharge direction of PT2 from "Horizontal" to "Up" 	8/14/2017

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