

STATEMENT OF BASIS for MAUSER USA, LLC.

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 17900 / Permit Activity Number: BOP160001

I. FACILITY INFORMATION

Mauser USA, LLC., is located at 14 Convery Blvd., Woodbridge, NJ 07095, Middlesex County and consists of a steel drum manufacturing plant. The facility is owned and operated by Mauser USA, LLC.

The facility is classified as a major facility based on its potential to emit 84.9 tons per year of volatile organic compounds.

It is also classified as a major hazardous air pollutant (HAP) facility. A major HAP emitting facility is designated as major when the allowed emissions exceed 10 tons per year of any individual hazardous air pollutant or 25 tons per year of any combination of individual hazardous air pollutants that may be emitted simultaneously.

This permit allows individual hazardous air pollutants to be emitted at a rate not to exceed: 21.5 tons per year of glycol ethers, 15.8 tons per year of xylene, 3.32 tons per year of ethylbenzene and 0.157 tons per year of phenol.

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 includes 5 paint spray booths, 5 gas-fired dryers, 4 paint mixing / supply rooms, a drum parts washer heated by natural gas, a silk screen printing press, silk screen washing station and a thermal clean oven. Four spray booths and 3 dryers vent to a thermal oxidizer with no less than 95% reduction efficiency for volatile organic compound and hazardous air pollutant emissions.

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 consistent with NJDEP Technical Manual 1003.

This is a Permit Renewal and there are no proposed changes to air contaminants.

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

STATEMENT OF BASIS for MAUSER USA, LLC.

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 17900 / Permit Activity Number: BOP160001

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.

Oven Dryers

For oven dryers, the facility monitors hours of operation as the surrogate for the long-term (TPY) emission limits for VOC, NOx, and CO. Surrogate monitoring for the short-term (lb/hr) emission limits are combustion process adjustment for NOx and CO.

Surface Coating Equipment

For surface coating operations, 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.

Manufacturing and Materials Handling Equipment

For manufacturing and materials handling equipment, raw materials and total material transferred (lb/hr) are monitored as surrogates for the short-term (lb/hr) emission limits for 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.

NESHAP Subpart A: General Provisions

NESHAP Subpart M: Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

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

STATEMENT OF BASIS for MAUSER USA, LLC.

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 17900 / Permit Activity Number: BOP160001

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

MAUSER USA, LLC PI 17900
BOP160001

New Jersey Department of Environmental Protection
Operating Permit Revision History

Permit Activity Number	Type of Revision	U/BP	Description of Revision	Final Action Date
BOP200002	Minor Modification		Mauser USA, LLC is submitting this Title V permit modification in order to permit the installation and operation of a new 1.5 MMBtu/hr thermal clean oven to pretreat metal drum lids and bottoms prior to coating operations.	6/16/20
BOP200001	Administrative Amendment		Administrative Amendment to change Responsible Official to Jeff Aurichio.	4/14/20
BOP170001	Administrative Amendment		Updated General Contact Information: Responsible Official to Dennis Mullin, Air Permit Information Contact to Dennis Mullin, Consultant to Mike Leuz, Emission Statements to Dennis Mullin, On-Site Manager to Dennis Mullin, Title V Compliance Certification Contact to Dennis Mullin, Updated the Company Name to Mauser USA, LLC. Updated FC Section, Corrected the Pollution Emissions Summary to reflect the limits in the compliance plan.	2/21/17

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