

**New Jersey Department of Environmental Protection
Reason for Application**

Permit Being Modified

Permit Class: PCP **Number:** 220001

Description of Modifications: This modification is being submitted in response to a Notice of Violation received from the NJDEP on May 28, 2024. PEA240001 outlined 3 violations for PCP220001 and they were as follows:

- a. The facility installed "TSD1" and "TSD2" equipment that processes over 50 lbs/hr without first obtaining a preconstruction permit
- b. The facility installed "TSD1" and "TSD2" equipment that processes over 50 lbs/hr without first obtaining an operating certificate
- c. The facility failed to comply with all conditions and provisions of PCP220001 CD8701 Dust Collector, Ref #2. Specifically, failing to maintain a pressure drop between >1 and <12 inches w.c. The pressure drop was below 1 during the inspection and records show that the pressure drop is routinely below 1 in w.c.

In order to address these violations this modification will do the following:

1. Add "TSD1" and "TSD2" to the Equipment Inventory and incorporate the 2 tanks into the operating scenarios. While reviewing the tanks onsite, "TSD3" was also discovered and has also been included in this modification. These tanks are all connected to the control device CD8701. This addition of these tanks to the permit does not result in any additional emissions.
2. Correcting the pressure drop requirements for the control device CD8701 to be 0.1 - 10 inches w.c. This control device had these parameters in a previous permit issuance and the facility can confirm that this range would cover normal operation of the control device.

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Facility Name (AIMS): BENJAMIN MOORE & CO

Facility ID (AIMS): 05067

Street 134 LISTER AVE
Address: NEWARK, NJ 07105

Mailing 134 LISTER AVE
Address: NEWARK, NJ 07105

County: Essex
Location PAINT MANUFACTURING
Description:

State Plane Coordinates:
X-Coordinate: 593,673
Y-Coordinate: 694,366
Units: New Jersey State Plane 8

Datum: NAD83
Source Org.: DEP-GIS
Source Type: Digital Image

Industry:
Primary SIC:
Secondary SIC:
NAICS: 325510

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Contact Type: Air Permit Information Contact**Organization:** Benjamin Moore & Co**Org. Type:** Corporation**Name:** Sarasi Sam**NJ EIN:****Title:** EHS Manager**Phone:** () - x**Mailing Address:** 134 Lister Ave**Fax:** () - x

Newark, NJ 07105

Other: () - x**Type:****Email:** sarasi.sam@benjaminmoore.com

Contact Type: Fees/Billing Contact**Organization:** Benjamin Moore & Co**Org. Type:** Corporation**Name:** Tara Rolley**NJ EIN:****Title:** Sr EHSS Compliance Manager**Phone:** () - x**Mailing Address:** 134 Lister Ave**Fax:** () - x

Newark, NJ 07105

Other: () - x**Type:****Email:** tara.rolley@benjaminmoore.com

Contact Type: Responsible Official**Organization:** Benjamin Moroe & Co**Org. Type:** Corporation**Name:** Adam Bielski**NJ EIN:****Title:** Manufacturing Manager**Phone:** () - x**Mailing Address:** 134 Lister Ave**Fax:** () - x

Newark, NJ 07105

Other: () - x**Type:****Email:** adam.bielski@benjaminmoore.com

**New Jersey Department of Environmental Protection
Facility Profile (Permitting)**

- | | |
|--|----|
| 1. Is this facility classified as a small business by the USEPA? | No |
| 2. Is this facility subject to N.J.A.C. 7:27-22? | No |
| 3. Are you voluntarily subjecting this facility to the requirements of Subchapter 22? | No |
| 4. Has a copy of this application been sent to the USEPA? | No |
| 5. If not, has the EPA waived the requirement? | No |
| 6. Are you claiming any portion of this application to be confidential? | No |
| 7. Is the facility an existing major facility? | No |
| 8. Have you submitted a netting analysis? | No |
| 9. Are emissions of any pollutant above the SOTA threshold? | No |
| 10. Have you submitted a SOTA analysis? | No |
| 11. If you answered "Yes" to Question 9 and "No" to Question 10, explain why a SOTA analysis was not required | |
| | |
| 12. Have you provided, or are you planning to provide air contaminant modeling? | No |

**New Jersey Department of Environmental Protection
Equipment Inventory**

| Equip. NJID | Facility's Designation | Equipment Description | Equipment Type | Certificate Number | Install Date | Grand- Fathered | Last Mod. (Since 1968) | Equip. Set ID |
|------------------------|-----------------------------------|----------------------------------|--|-------------------------------|-------------------------|----------------------------|-----------------------------------|--------------------------|
| E87158 | TSD1 | TSD1 - Mizing Tank | Manufacturing and Materials Handling Equipment | | | No | | ES2 |
| E87159 | TSD2 | TSD2 - Mixing Tank | Manufacturing and Materials Handling Equipment | | | No | | ES2 |
| E87160 | TSD3 | TSD3 - Mixing Tank | Manufacturing and Materials Handling Equipment | | | No | | ES2 |

**New Jersey Department of Environmental Protection
Control Device Inventory**

| CD NJID | Facility's Designation | Description | CD Type | Install Date | Grand- Fathered | Last Mod. (Since 1968) | CD Set ID |
|--------------------|-----------------------------------|--------------------|-----------------------------------|-------------------------|----------------------------|-----------------------------------|----------------------|
| CD8701 | DC 001 | Dust Collector | Particulate Filter (Cartridge) | 9/1/1999 | No | 9/1/1999 | |
| CD8702 | DC 002 | Dust Collector | Particulate Filter (Cartridge) | 11/15/2003 | No | 11/15/2003 | |

**New Jersey Department of Environmental Protection
Emission Points Inventory**

| PT NJID | Facility's Designation | Description | Config. | Equiv. Diam. (in.) | Height (ft.) | Dist. to Prop. Line (ft) | Exhaust Temp. (deg. F) | | | Exhaust Vol. (acfm) | | | Discharge Direction | PT Set ID |
|------------|---------------------------|-----------------------|---------|--------------------------|-----------------|--------------------------------|------------------------|------|-------|---------------------|----------|----------|------------------------|--------------|
| | | | | | | | Avg. | Min. | Max. | Avg. | Min. | Max. | | |
| PT8701 | 013 | Stack #013 - baghouse | Round | 26 | 45 | 205 | 75.0 | 50.0 | 105.0 | 20,000.0 | 15,000.0 | 20,000.0 | Up | |
| PT100008 | DC 002 | Dust Collector DC 002 | Round | 24 | 40 | 237 | 60.0 | 32.0 | 180.0 | 12,750.0 | 12,750.0 | 12,750.0 | Up | |

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

BP1 Latex Paint Latex Paint Prodcuton Batch Process

OS9 150 g/l prod Batch Process - 150 g/l Blend BPOS Type: Batch Manufacturing

| Batch Process Operating Scenario Run Time (hours) | | | Min. Calc. Time: 3.0 | | Max. Calc. Time: 12.0 | | Min. User Time: | | | Max. User Time: | | | | |
|---|------------------------|-----------------------|-----------------------|----------------|--------------------------|--------------------|-----------------|---------------------|------|-----------------|-------------|---------|---------------|-------|
| Step NJID | Facility's Designation | Step Description | Operation Type | Signif. Equip. | Control Device(s) | Emission Point(s) | SCC(s) | Step Run Time Hours | | VOC Range | Flow (acfm) | | Temp. (deg F) | |
| | | | | | | | | Min. | Max. | | Min. | Max. | Min. | Max. |
| ST1 | Dispersion | Charging Initial Tank | Normal - Steady State | ES2 | CD8701 (P) CD8702 (P) | PT100008 PT8701 | 3-01-014-60 | 1.0 | 4.0 | A | 200.0 | 1,000.0 | 60.0 | 180.0 |
| ST2 | Dispersion | Mixing/Heating | Normal - Steady State | ES2 | CD8701 (P) CD8702 (P) | PT100008 PT8701 | 3-01-014-01 | 1.0 | 4.0 | A | 200.0 | 1,000.0 | 60.0 | 180.0 |
| ST3 | Dispersion | Charging to New Tank | Normal - Steady State | ES2 | CD8701 (P) CD8702 (P) | PT100008 PT8701 | 3-01-014-60 | 1.0 | 4.0 | A | 200.0 | 1,000.0 | 60.0 | 180.0 |

U 1

| UOS NJID | Facility's Designation | UOS Description | Operation Type | Signif. Equip. | Control Device(s) | Emission Point(s) | SCC(s) | Annual Oper. Hours | | VOC Range | Flow (acfm) | | Temp. (deg F) | |
|----------|------------------------|-----------------|----------------|----------------|-------------------|-------------------|--------|--------------------|------|-----------|-------------|------|---------------|------|
| | | | | | | | | Min. | Max. | | Min. | Max. | Min. | Max. |

000000 E87158 (Manufacturing and Materials Handling Equipment)
Print Date: 6/11/2024

| | |
|---|--|
| Make: | <input type="text"/> |
| Manufacturer: | <input type="text"/> |
| Model: | <input type="text"/> |
| Type of Manufacturing and Materials Handling Equipment: | <input type="text" value="Mixing Tank"/> |
| Capacity: | <input type="text" value="2.50E+02"/> |
| Units: | <input type="text" value="gallons"/> |
| Description (if other): | <input type="text"/> |
| Have you attached a diagram showing the location and/or the configuration of this equipment? | <input type="text" value="No"/> |
| Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? | <input type="text" value="No"/> |
| Comments: | |

000000 E87159 (Manufacturing and Materials Handling Equipment)
Print Date: 6/11/2024

| | |
|---|--|
| Make: | <input type="text"/> |
| Manufacturer: | <input type="text"/> |
| Model: | <input type="text"/> |
| Type of Manufacturing and Materials Handling Equipment: | <input type="text" value="Mixing Tank"/> |
| Capacity: | <input type="text" value="4.80E+02"/> |
| Units: | <input type="text" value="gallons"/> |
| Description (if other): | <input type="text"/> |
| Have you attached a diagram showing the location and/or the configuration of this equipment? | <input type="text" value="No"/> |
| Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? | <input type="text" value="No"/> |
| Comments: | |

000000 E87160 (Manufacturing and Materials Handling Equipment)
Print Date: 6/11/2024

| | |
|---|--|
| Make: | <input type="text"/> |
| Manufacturer: | <input type="text"/> |
| Model: | <input type="text"/> |
| Type of Manufacturing and Materials Handling Equipment: | <input type="text" value="Mixing Tank"/> |
| Capacity: | <input type="text" value="2.50E+02"/> |
| Units: | <input type="text" value="gallons"/> |
| Description (if other): | <input type="text"/> |
| Have you attached a diagram showing the location and/or the configuration of this equipment? | <input type="text" value="No"/> |
| Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? | <input type="text" value="No"/> |
| Comments: | |

000000 CD8701 (Particulate Filter (Cartridge))
Print Date: 6/11/2024

| | |
|---|-----------------------------------|
| Make: | <input type="text"/> |
| Manufacturer: | <input type="text"/> |
| Model: | <input type="text"/> |
| Number of Cartridges: | <input type="text"/> |
| Size of Cartridges (ft²): | <input type="text"/> |
| Total Cartridge Area (ft²): | <input type="text"/> |
| Maximum Design Temperature Capability (°F): | <input type="text"/> |
| Maximum Design Air Flow Rate (acfm): | <input type="text"/> |
| Maximum Air Flow Rate to Filter Area Ratio: | <input type="text"/> |
| Minimum Operating Pressure Drop (in. H2O): | <input type="text" value="0.10"/> |
| Maximum Operating Pressure Drop (in. H2O): | <input type="text" value="8.00"/> |
| Maximum Inlet Temperature (°F): | <input type="text"/> |

| | |
|--|----------------------|
| Maximum Operating Exhaust Gas Flow Rate (acfm): | <input type="text"/> |
| Method for Determining When Cartridge Replacement is Required: | <div></div> |

| | |
|---|-------------|
| Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-Permitted Sources): | <div></div> |
| Alternative Method to Demonstrate Control Apparatus is Operating Properly: | <div></div> |

| | |
|--|---|
| Have you attached a Particle Size Distribution Analysis? | <input type="radio"/> Yes <input checked="" type="radio"/> No |
|--|---|

| | |
|---|---|
| Have you attached data from recent performance testing? | <input type="radio"/> Yes <input checked="" type="radio"/> No |
|---|---|

| | |
|---|---|
| Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus? | <input type="radio"/> Yes <input checked="" type="radio"/> No |
|---|---|

| | |
|--|---|
| Have you attached a diagram showing the location and/or configuration of this control apparatus? | <input type="radio"/> Yes <input checked="" type="radio"/> No |
|--|---|

Comments:

000000 CD8702 (Particulate Filter (Cartridge))
Print Date: 6/11/2024

Make:

Manufacturer:

Model:

Number of Cartridges:

Size of Cartridges (ft²):

Total Cartridge Area (ft²):

Maximum Design Temperature Capability (°F):

Maximum Design Air Flow Rate (acfm):

Maximum Air Flow Rate to Filter Area Ratio:

Minimum Operating Pressure Drop (in. H₂O):

Maximum Operating Pressure Drop (in. H₂O):

Maximum Inlet Temperature (°F):

Maximum Operating Exhaust Gas Flow Rate (acfm):

Method for Determining When Cartridge Replacement is Required:

Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-Permitted Sources):

Alternative Method to Demonstrate Control Apparatus is Operating Properly:

Have you attached a Particle Size Distribution Analysis?

☐ Yes ☒ No

Have you attached data from recent performance testing?

☐ Yes ☒ No

Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?

☐ Yes ☒ No

Have you attached a diagram showing the location and/or configuration of this control apparatus?

☐ Yes ☒ No

Comments: