



VIA NJDEP ONLINE PORTAL SUBMITTAL

January 6, 2020

Mr. Bachir Bouzid, Chief
Operating Permits Section
New Jersey Department of Environmental Protection
Division of Air Quality - Bureau of Stationary Sources
401 East State Street, 2nd Floor
Trenton, New Jersey 08625-0027

Education

Energy Utility

Hospitality

Public Sector

Real Estate

Science & Technology

REF: Kearny Steel Container Corporation
Program Interest Number: 07674 - Permit Activity Number: BOP170001
TITLE V AIR OPERATING PERMIT RENEWAL APPLICATION SUBMITTAL

Dear Mr. Bouzid:

Kearny Steel Container Corporation (KSC) has electronically certified and submitted this Title V Air Operating Permit Renewal Application through the NJDEP Online Portal for the KSC Facility - PI #07674.

This Renewal Application was prepared and submitted in accordance with all applicable Renewal Requirements in N.J.A.C. 7:27-22.30, all applicable requirements in the completed NJDEP "Attachment to the RADIUS Air Operating Permit Renewal Application", the requirements of the Kearny Steel Container Corp Operating Permit, and all other applicable NJDEP Renewal Application guidance and procedures.

We would appreciate receiving a PREDRAFT of the KSC Title V Air Operating Permit Renewal Approval for our review prior to your issuance for public comment and to USEPA. Should you have any questions regarding this Renewal Application, please feel free to email me or call me at 732-584-0231.

Very truly yours,

PAULUS, SOKOLOWSKI & SARTOR, LLC

P. Steve Oliver
Chief Air Quality Engineer
Environmental Compliance

Attachments

67B Mountain Blvd Ext
PO Box 4039
Warren, NJ 07059

t. 732.560.9700

www.psands.com

Cc: Michael Verzaleno Jr., KSC
Jerry Pica, GNPATP, LLC
David Owen, NJDEP

Kearny Steel Container Corporation

Title V Air Operating Permit Renewal Application

BOP Program Interest No. 07674
Permit Activity No. BOP 170001

Submitted to:

**New Jersey Department of Environmental Protection
Division of Air Quality – Bureau of Stationary Sources
Operating Permits Section**

January 6, 2020

Prepared by:



PAULUS, SOKOLOWSKI AND SARTOR, LLC

Environmental Compliance

67B Mountain Boulevard Extension
Warren, New Jersey 07059

Kearny Steel Container Corporation

**Title V Air Operating Permit
Renewal Application**

BOP Program Interest No. 07674
Permit Activity No. BOP 170001

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ENCLOSURE 1

**PDF of RADIUS Air Operating Permit
Renewal Application**

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

Permit Being Modified

Permit Class: PCP **Number:** 170001

Description of Modifications: This Application is for the five-year renewal of the Kearny Steel Container Corporation existing Title V Air Operating Permit (Operating Permit), and this Renewal Application includes all applicable information required by N.J.A.C. 7:27-22.30, and the requirements in the NJDEP "Attachment to the RADIUS Air Operating Permit Renewal Application" (including Attachment instructions and forms), the requirements of the Kearny Steel Container Corp Operating Permit, and other applicable NJDEP Renewal Application guidance and procedures.

SUMMARY OF CHANGES TO OPERATING PERMIT DURING PAST FIVE-YEAR TERM:

- BOP170001 Administrative Amendment Approval (6/22/2017) - This Administrative Amendment Approval was for updating the Kearny Steel Container Corp (KSC) "Fees/Billing Contact" information.
- During the past five-year term of the existing KSC Operating Permit, there have been no other changes to the Operating Permit and no emission increases.

ADDITIONAL REQUESTED CHANGES TO OPERATING PERMIT: There are no additional changes being requested in this Renewal Application for the KSC Operating Permit.

CHANGES FOR INSIGNIFICANT SOURCES: There have been no additional changes for any Insignificant Source Operations at the KSC Title V Facility during the past five-year term.

SUMMARY OF RESULTS OF SOURCE EMISSIONS TESTING PERFORMED SINCE THE LAST OPERATING PERMIT RENEWAL: Summary Tables of the results of Source Emissions Testing performed since the last Operating Permit Renewal are included in ENCLOSURE 3 of this Renewal Application Submittal Package.

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

Facility Name (AIMS): KEARNY STEEL CONTAINER CORP

Facility ID (AIMS): 07674

Street 401 SOUTH ST
Address: NEWARK, NJ 07105

Mailing 401 SOUTH ST
Address: NEWARK, NJ 07105

County: Essex
Location
Description:

State Plane Coordinates:	
X-Coordinate:	585,885
Y-Coordinate:	686,345
Units:	New Jersey State Plane 8
Datum:	NAD83
Source Org.:	DEP-Program
Source Type:	DEP Program Database

Industry:	
Primary SIC:	5085
Secondary SIC:	
NAICS:	423830

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

Contact Type: Air Permit Information Contact**Organization:** GNPATP, LLC**Org. Type:** LLC**Name:** Gerard N. Pica**NJ EIN:****Title:** V.P. GNPATP, LLC**Phone:** (732) 673-6396 x**Mailing Address:** 29 Spring Court
Tinton Falls, NJ 07724**Fax:** () - x**Other:** () - x**Type:****Email:** gnppdm@verizon.net

Contact Type: Consultant**Organization:** Paulus, Sokolowski and Sartor, LLC**Org. Type:** LLC**Name:** P. Steve Oliver**NJ EIN:****Title:** Chief Air Quality Engineer**Phone:** (732) 584-0231 x**Mailing Address:** 67A Mountain Blvd. Ext.
Warren, NJ 07059**Fax:** (732) 271-4890 x**Other:** () - x**Type:****Email:** soliver@psands.com

Contact Type: Emission Statements**Organization:** GNPATP, LLC**Org. Type:** LLC**Name:** Gerard N. Pica**NJ EIN:****Title:** V.P. GNPATP, LLC**Phone:** (732) 673-6396 x**Mailing Address:** 29 Spring Court
Tinton Falls, NJ 07724**Fax:** () - x**Other:** () - x**Type:****Email:** gnppdm@verizon.net

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

Contact Type: Fees/Billing Contact**Organization:** Kearny Steel Container Corp.**Org. Type:** Corporation**Name:** Susan Carrano**NJ EIN:****Title:****Phone:** (973) 589-2070 x**Mailing Address:** 401 South Street**Fax:** (973) 589-1770 x

Newark, NJ 07105-1916

Other: () - x**Type:****Email:** susan.carrano@kearnysteel.com

Contact Type: Operator**Organization:** Kearny Steel Container Corp.**Org. Type:** Corporation**Name:** Ron & Paul Adamson**NJ EIN:****Title:** Plant Engineer/Maintenance**Phone:** (973) 589-2070 x**Mailing Address:** 401 South Street**Fax:** (973) 589-1770 x

Newark, NJ 07105-1916

Other: () - x**Type:****Email:** kearnysteel@yahoo.com

Contact Type: Owner (Current Primary)**Organization:** Kearny Steel Container Corp.**Org. Type:** Corporation**Name:** Mike Verzaleno**NJ EIN:****Title:** President**Phone:** (973) 589-2070 x**Mailing Address:** 401 South Street**Fax:** (973) 589-1770 x

Newark, NJ 07105-1916

Other: () - x**Type:****Email:** mike.verzaleno@kearnysteel.com

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

Contact Type: Responsible Official

Organization: Kearny Steel Container Corp.

Org. Type: Corporation

Name: Michael Verzaleno Jr.

NJ EIN:

Title: Vice president

Phone: (973) 589-2070 x

Mailing 401 South Street

Fax: (973) 589-1770 x

Address: Newark, NJ 07105-1916

Other: (973) 417-2800 x

Type: 24 Hr Line

Email: mike.verzaleno@kearnysteel.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? | Yes |
| 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? | Yes |
| 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 |

ENCLOSURE 2

Completed “Attachment to the RADIUS Air Operating Permit Renewal Application”

(Provided as a separate Attachment with this RADIUS Application submittal)



**New Jersey Department of Environmental Protection
Division of Air Quality**

**Attachment to the
RADIUS Air Operating Permit Renewal
Application**

Submittal Date: 01/06/2020

Facility Name: KEARNY STEEL CONTAINER CORP

PI#: 7674

This package must be submitted as an attachment to the RADIUS Air Operating Permit Renewal Application. The forms contained in this package must not be altered. Use of any non-standard forms will require resubmittal of the renewal application. If the file is too large to submit, please perform a Save As to optimize the file for Fast Web View using Adobe PDF software. Contact the Department if this does not solve the problem, and you still have issues submitting this package.

**New Jersey Department of Environmental Protection
401 East State Street, 2nd Floor, P.O. Box 420, Mail Code 401-02, Trenton, NJ 08625-0420**

Operating Permits Helpline 609-633-8248

Revised Jun 29, 2018

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Applying for an Air Operating Permit Renewal

This summary was prepared to assist you in renewing an operating permit. To continue lawful operation of a facility that has obtained an approved operating permit, a permittee must initiate the renewal of the operating permit by submitting a timely and administratively complete permit application. A complete operating permit renewal application consists of the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package, along with any supporting documents (if needed).

1. Timely

To be considered timely pursuant to N.J.A.C. 7:27-22.30(c), the Department must receive an administratively complete renewal application at least 12 months prior to expiration of the operating permit. The applicant is encouraged to voluntarily submit the renewal application at least 15 months prior to expiration of the operating permit, so that any deficiencies in the application can be addressed prior to the application due date. Only applications, which are administratively complete by the application deadline, will be eligible for coverage by an application shield.

2. Administratively Complete

To be deemed administratively complete pursuant to N.J.A.C. 7:27-22.30(d), an operating permit renewal application must include all information requested in the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package.

3. Application Shield

The Department will grant an application shield when a timely and administratively complete application is received pursuant to N.J.A.C. 7:27-22.30(g). An application shield grants the right to operate the facility upon the expiration of its operating permit. If an operating permit has expired, the conditions of the operating permit remain enforceable until the operating permit is reissued. Unless a facility obtained an application shield, the right to operate the facility terminates upon the expiration of its operating permit pursuant to N.J.A.C. 7:27-22.30(i).

4. Permit Changes During Renewal Process

Minor changes, such as those that would qualify for a seven-day-notice change or administrative amendment, may be made with the renewal pursuant to N.J.A.C. 7:27-22.30(d). Significant changes, such as those qualifying for a minor or significant modification, must be submitted as a separate permit application. The Department at its discretion may include approval of these proposed changes along with the approval of the renewal application.

5. New HAP Reporting Thresholds

Pursuant to N.J.A.C. 7:27-22.30(l), for any operating permit expiring on or after February 12, 2021, HAP emissions from a source operation that equal or exceed the reporting threshold specified in N.J.A.C. 7:27-17.9(a) must be included during this operating permit renewal process. Any HAP that is not authorized in the operating permit in effect must be included through the submittal of a permit modification application pursuant to N.J.A.C. 7:27-22.23 or N.J.A.C. 7:27-22.24 as applicable.

Attachment to the RADIUS Air Operating Permit Renewal Application

Section 1 **Compliance Requirements**

A. Compliance Assurance Monitoring (CAM) Applicability Determination

EPA developed 40 CFR 64 (Compliance Assurance Monitoring or "CAM") in order to provide reasonable assurance that facilities comply with emission limitations by monitoring the operation and maintenance of their control devices. In general, CAM applies to emission units that meet all of the following conditions:

1. The emission unit is located at a major source for which a Title V permit is required;
2. The emission unit is subject to an emission limitation or standard for a specific contaminant;
3. The emission unit uses a control device to achieve compliance with that specific contaminant's federally enforceable limit or standard;
4. The emission unit has potential pre-control or post-control emissions (of that specific contaminant) of at least 100% of the major source amount (see 40 CFR 64.2 - "Major facility"); and
5. The emission unit is not otherwise exempt from CAM (for exemptions, see 40 CFR 64.2(b)).

To learn more about the CAM program and for guidance on how to prepare a CAM plan, check EPA's website: <https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring>.

After reviewing the information above, check the following boxes as applicable:

☒ **NO**, my facility **does not** have any emission units subject to CAM requirements.

☐ **YES**, my facility **does** have one or more emission units subject to CAM requirements, and

☐ A CAM plan is provided with this operating permit renewal application.

☐ A CAM plan will be submitted during the technical review of this renewal application.

B. Health Risk Assessment

1. Consistent with N.J.A.C. 7:27-22.3(cc), the Department will review each operating permit renewal application to ensure that emissions of Hazardous Air Pollutants (HAPs) do not pose a public health risk.
2. After receipt of the renewal application, the Department will notify applicants if a Facility-Wide Risk Assessment must be performed. A plot plan and air dispersion modeling protocol will be required in that case.
3. Previous Facility-Wide Risk Assessment, additions and changes in toxicity values or standards, and changes in the air model and/or the facility's location (in an Environmental Justice area, near a sensitive population etc.) will determine the need for health risk assessment.

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

Attachment to the RADIUS Air Operating Permit Renewal Application

C. Acid Rain Program

To learn more about Acid Rain Program, check EPA's website: <https://www.epa.gov/airmarkets/acid-rain-program>.

Check the following boxes as applicable:

- ☒ **NO**, this facility is **not subject** to the Acid Rain Program, codified at 40 CFR 72.
- ☐ **YES**, this facility is **subject** to the Acid Rain Program, codified at 40 CFR 72, and
- ☐ There have been no changes affecting my facility's Acid Rain Permit and a renewal application is provided with this operating permit renewal application.
 - ☐ There have been changes affecting my facility's Acid Rain Permit and a revised/updated application is provided with this operating permit renewal application.

D. N.J.A.C. 7:27-18 Netting Analysis and General Operating Permit Determination

Air permit applications requesting air emissions increases are required to include a netting analysis to determine if the resulting net emission increase at the facility constitutes a significant net emission increase pursuant to N.J.A.C. 7:27-18.7. These netting analyses must be kept on site or submitted to the Department consistent with the Department's guidance included in the memo listed under "N.J.A.C. 7:27-18 Netting Analysis" and the "General Procedures for General Operating Permits" on the Department's webpage <http://www.state.nj.us/dep/agpp/permitguide.html> and <http://www.state.nj.us/dep/agpp/gop.html>, respectively. The Department intends to review these analyses at least once in 5 years unless no permit modifications proposing emissions increases were made and no GOPs were obtained during the past 5-year permit term. All netting analyses corresponding to a modification to increase emissions or a GOP must be submitted to the Department. Any netting analyses submitted with a modification application during the 5-year permit term do not need to be submitted again with the permit renewal application.

Check the following boxes as applicable:

- ☒ **NO**, this facility **has not made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal.
- ☐ **YES**, this facility **has made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal, and
- ☐ One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, were provided with a modification application during the 5-year permit term.
 - ☐ One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, are provided with this permit renewal application.
 - ☐ One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, will be submitted during the technical review of this permit renewal application.

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

Attachment to the RADIUS Air Operating Permit Renewal Application
Section 2
Certification

No additional certification is required when submitting the operating permit renewal application through NJDEP Online: <http://www.nj.gov/dep/online/>.
Complete the information below when submitting the operating permit renewal application on an electronic storage device, through the mail. Click on the icon on the signature line to add an image of a signature saved on your computer. If you do not have one, print the form out and manually sign on the line.

Facility PI#: 7674
Facility Name: KEARNY STEEL CONTAINER CORP

Responsible Official:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

Name: Certified and submitted through NJDEP Online **Signature:** _____ **Date:** 01/06/2020

Individuals with Direct Knowledge:

I certify under penalty of law that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

Name: _____ **Signature:** _____ **Date:** _____
Section Being Certified: _____

Name: _____ **Signature:** _____ **Date:** _____
Section Being Certified: _____

Name: _____ **Signature:** _____ **Date:** _____
Section Being Certified: _____

Name: _____ **Signature:** _____ **Date:** _____
Section Being Certified: _____

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

Attachment to the RADIÜŞ Air Operating Permit Renewal Application

Section 3
Summary of 7-Day Notice Changes

Instructions

Complete this form if any 7-day notice changes were submitted to the NJDEP since the approval of the initial operating permit or most recent renewal thereof. With this information, the NJDEP will include the provisions of any eligible 7-day notice changes into the renewed permit.

No.	Date of 7-Day Notice	Brief Description of Change
		NONE



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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 4
Summary of the results from Stack Testing and Monitoring

Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS0/ #1	The permittee shall conduct a stack test at least 18 months prior to the expiration of the renewed operating permit using an approved protocol to demonstrate compliance with emission limits for NO _x , CO, VOC, TSP, PM-10, lead, HCl and cadmium as specified in the compliance plan for U1, OS summary & OS1. Testing must be conducted at	Monitoring as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].	Recordkeeping as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Bureau of Technical Services (BTS) at Mail Code: 380-01A, PO Box 420, Trenton, NJ 08625 at least 30 months prior to the expiration of the approved operating permit. The protocol and test report must be		
U1	OS0/ #13	HCl Emissions <= 50 ppmvd @ 7% O ₂ . [N.J.A.C. 7:27-22.16(e)]	HCl Emissions: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. See stack testing requirements under OS summary. [N.J.A.C. 7:27-22.16(o)]	HCl Emissions: Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22.16(o)]		

Make additional copies of this form if needed.

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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 4
Summary of the results from Stack Testing and Monitoring

Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS0/ #16	CO ≤ 100 ppmvd @ 7% O ₂ . [N.J.A.C. 7:27-22.16(e)]	CO: Monitored by continuous emission monitoring system continuously. [N.J.A.C. 7:27-22.16(o)]	CO: Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27-22.16(o)]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding calendar quarter (the calendar quarters begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal. [N.J.A.C. 7:27-22.16(e)]		
U1	OS0/ #17	The owner or operator shall develop a QA/QC plan for all CEMS/COMS required by this permit prepared in accordance with the NJDEP Technical Manual 1005 posted on the AQPP webpage at http://www.state.nj.us/dep/aqpp . [N.J.A.C. 7:27-22.16(a)]	The QA/QC coordinator shall be responsible for reviewing the QA/QC plan on an annual basis. [N.J.A.C. 7:27-22.16(o)].	Maintain readily accessible records of the QA/QC plan including QA date and quarterly reports. [N.J.A.C. 7:27-22.16(o)].	None.		

Make additional copies of this form if needed.



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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 4
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Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS0/ #23	Oxygen ≥ 3 %. Minimum oxygen concentration in the flue gas at the exit of the thermal oxidizer's secondary chamber for any one minute period. [N.J.A.C. 7:27-22.16(e)]	Monitored by oxygen concentration meter continuously. [N.J.A.C. 7:27-22.16(o)].	Oxygen: Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27-22.16(o)]	None.		
U1	OS1/ #1	VOC (Total) ≤ 2.6 lb/hr. [N.J.A.C. 7:27-22.16(e)]	VOC (Total): Monitored by stack emission testing prior to permit expiration date, based on each of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	VOC (Total): Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22.18(h)]		

Make additional copies of this form if needed.



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Attachment to the RADIUS Air Operating Permit Renewal Application

**Section 4
Summary of the results from Stack Testing and Monitoring**

Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS1/ #2	NOx (Total) <= 5 lb/hr. [N.J.A.C. 7:27-22.16(e)]	NOx (Total): Monitored by stack emission testing prior to permit expiration date, based on each of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	NOx (Total): Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22.18(h)]		
U1	OS1/ #3	CO <= 9.04 lb/hr. [N.J.A.C. 7:27-22.16(e)]	CO: Monitored by stack emission testing prior to permit expiration date, based on each of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	CO: Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22.18(h)]		

Make additional copies of this form if needed.



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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 4
Summary of the results from Stack Testing and Monitoring

Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS1/ #5	TSP <= 2.8 lb/hr. [N.J.A.C. 7:27-22.16(e)]	TSP: Monitored by stack emission testing prior to permit expiration date, based on each of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	TSP: Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22]		
U1	OS1/ #6	PM-10 (Total) <= 4.1 lb/hr. [N.J.A.C. 7:27-22.16(o)]	PM-10 (Total): Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	PM-10 (Total): Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22]		

Make additional copies of this form if needed.



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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 4
Summary of the results from Stack Testing and Monitoring

Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS1/ #7	HCl Emissions <= 5.9 lb/hr. [N.J.A.C. 7:27-22.16(e)]	HCl Emissions: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	HCl Emissions: Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22.18(h)]		
U1	OS1/ #8	Lead Emissions <= 0.008 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Lead Emissions: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Lead Emissions: Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22.18(h)]		

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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 4
Summary of the results from Stack Testing and Monitoring

Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS1/ #9	Cadmium Emissions <= 0.0012 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Cadmium Emissions: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Cadmium Emissions: Recordkeeping by stack test results upon occurrence of event. See the stack testing requirements under OS Summary. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS summary. [N.J.A.C. 7:27-22.18(h)]		

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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 5 **Compliance Status**

Instructions

Please read these instructions prior to completing the following form.

1. **Subject Item:** List each subject item from Section D, Compliance Plan and Inventories, of the operating permit in this column. Subject items include Facility (FC), Group (GR), Non-Source Fugitive Emissions (FG), Insignificant Source (IS), Batch Process (BP), and Emission Unit (U). (Operating Scenario and Reference Numbers are required only for Non-Compliance permit requirements. See item 2 below).
2. **Compliance Status:** Provide compliance status for each subject item in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "In Compliance". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and write "Non-Compliance" in the 2nd column. (Reference Numbers for each applicable requirement are located in the first column of Facility Specific Requirements, Section D of the permit).
3. **Method Used to Determine Compliance:** Describe how compliance was determined in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "Consistent with all methods listed in monitoring and recordkeeping permit requirements". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and provide specific method used to determine compliance in the 3rd column.
4. **Compliance Schedule:** insert a "No" if there are no compliance schedules included in this application to address non-compliance issues for which "Non-Compliance" was inserted in the 2nd column. Insert a "Yes" if a compliance schedule is included in this renewal application to address non-compliance issues in the approved permit or non-compliance issues disclosed in this application.

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Attachment to the RADIUS Air Operating Permit Renewal Application

**Section 5
Compliance Status**

Instructions

Read the instructions on the previous page before completing this form.

Subject Item OS / Ref #	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
Subject Item FC	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			
Subject Item IS1	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			
Subject Item U1	Non-Compliance	Lead Emissions: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. See the stack testing requirements testing requirements under OS Summary.	Yes
OS / Ref #		Lead Emissions: Recordkeeping by stack test results upon occurrence of event. See the stack	
OS1/ Ref #8		Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements under OS Summary.	

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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 5
Compliance Status

Instructions

Read the instructions on the previous page before completing this form.

Subject Item	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
OS / Ref #			
Subject Item U2	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			
Subject Item U3	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			
Subject Item U4	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			

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Attachment to the RADIUS Air Operating Permit Renewal Application

**Section 5
Compliance Status**

Instructions

Read the instructions on the previous page before completing this form.

Subject Item	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
OS / Ref #			
Subject Item U6	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			
Subject Item U7	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			
Subject Item U8	In Compliance	Consistent with all methods listed in monitoring and recordkeeping requirements	No
OS / Ref #			

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Attachment to the RADIUS Air Operating Permit Renewal Application

Section 5
Compliance Schedules

Instructions

Complete this form if the permit included any compliance schedules (Section D of the permit) or if there are any non-compliance issues at the time of completing this application form. Check the appropriate box to indicate whether the compliance schedule has been updated, removed, or added.

Subject Item OS / Ref #	Requirement	Compliance Schedule	Compliance Schedule		
			Updated	Removed	Added
Subject Item U1	Lead Emissions <= 0.008 lb/hr.	Kearny Steel Container Corp has assessed potential source of the higher lead emission that occurred			✓
	Lead Emissions: Monitored by stack emission testing prior to permit expiration date based on the average				
OS / Ref # OS1/ Ref #8	Lead Emissions: Recordkeeping by stack test results using assurance of event				
	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack				
Subject Item					
OS / Ref #					
Subject Item					
OS / Ref #					

Make additional copies of this form if needed.

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ENCLOSURE 3

Source Emissions Testing Results Summary Tables (U1)

(Required under N.J.A.C. 7:27-22.30(d)4)

**TABLE 4-1
RESULTS SUMMARY NO_x, CO, AND VOC EMISSIONS
KEARNY STEEL CONTAINER
DRUM RECLAIMING FURNACE OUTLET**

Run Number:	1	2	3	Average	Emission Limit
Date:	9/17/19	9/17/19	9/17/19	--	--
Time:	0520-0717	0820-0945	1100-1229	--	--
Process Data:					
Drums per hour	300	300	300	300	--
Afterburner temperature, °F	1536.20	1575.83	1552.49	1554.84	--
O ₂ , %	15.46	15.36	15.97	15.60	--
Flue Gas:					
O ₂ , % volume dry	19.016	19.1692	19.2231	19.136	--
CO ₂ , % volume dry	1.1262	1.098	1.0633	1.096	--
Flue gas temperature °F	454.00	469.28	474.76	466.013	--
Moisture content, % volume	3.33	2.95	2.90	3.060	--
Volumetric flow rate, dscfm	30515.2	33168	32972.2	32218.467	--
Nitrogen Oxides [NO_x as NO₂] Emissions:					
ppmv, dry	1.12E+01	1.33E+01	1.32E+01	1.26E+01	--
lb/hour	2.45E+00	3.16E+00	3.11E+00	2.91E+00	5
Carbon Monoxide [CO] Emissions:					
ppmv, dry	1.06E+00	1.87E+00	1.25E+00	1.39E+00	--
ppmv, dry @ 7% O ₂	7.82E+00	1.50E+01	1.04E+01	1.11E+01	100
lb/hour	1.41E-01	2.70E-01	1.80E-01	1.97E-01	9.04
Total Non-Methane Hydrocarbons (as Methane) [VOC] Emissions:					
ppmv, dry	4.56E+00	4.86E+00	4.05E+00	4.49E+00	--
lb/hour	3.48E-01	4.03E-01	3.34E-01	3.62E-01	2.6

%: percent

°F: degrees Fahrenheit

dscfm: dry standard cubic feet per minute

ppmv, dry: parts per million by volume, dry basis

ppmv, dry @ 7% O₂: parts per million by volume, dry basis, corrected to 7% oxygen

lb/hour: pounds per hour

**TABLE 4-2
RESULTS SUMMARY HCL EMISSIONS
KEARNY STEEL CONTAINER
DRUM RECLAIMING FURNACE OUTLET**

Run	1	2	3	Average	Emission Limit
Date:	9/17/19	9/17/19	9/17/19	--	--
Time:	0520-0717	0820-0945	1100-1229	--	--
Process Data:					
Drums per hour	300	300	300	300	--
Afterburner temperature, °F	1536.20	1575.83	1552.49	1554.84	--
O ₂ , %	15.46	15.36	15.97	15.60	--
Flue Gas:					
O ₂ , % volume dry	19.016	19.1692	19.2231	19.136	--
CO ₂ , % volume dry	1.1262	1.098	1.0633	1.096	--
Flue gas temperature °F	454.00	469.28	474.76	466.013	--
Moisture content, % volume	3.33	2.95	2.90	3.060	--
Volumetric flow rate, dscfm	30515.2	33168	32972.2	32218.467	--
HCl Emissions:					
ppmv, dry	5.76E+00	3.28E+00	5.34E+00	4.79E+00	--
ppmv, dry @ 7% O ₂	4.25E+01	2.63E+01	4.43E+01	3.77E+01	50
lb/hour	9.98E-01	6.18E-01	9.99E-01	8.72E-01	5.9

%: percent

°F: degrees Fahrenheit

dscfm: dry standard cubic feet per minute

ppmv, dry: parts per million by volume, dry basis

ppmv, dry @ 7% O₂: parts per million by volume, dry basis, corrected to 7% oxygen

lb/hour: pounds per hour

**TABLE 4-3
RESULTS SUMMARY METALS EMISSIONS
KEARNY STEEL CONTAINER
DRUM RECLAIMING FURNACE OUTLET**

Run	1		2		3		Average		Emission Limit	
Date:	9/17/19		9/17/19		9/17/19		--		--	
Time:	0520-0736		0820-1030		1100-1312		--		--	
Process Data:										
Drums per hour	300		300		300		300		--	
Afterburner temperature, °F	1542.27		1574.88		1547.70		1554.95		--	
O ₂ , %	15.42		15.45		16.04		15.64		--	
Flue Gas:										
O ₂ , % volume dry	19.016		19.1692		19.2231		19.136		--	
CO ₂ , % volume dry	1.1262		1.098		1.0633		1.096		--	
Flue gas temperature, °F	457.52		469.96		472.40		466.627		--	
Moisture content, % volume	3.42		3.21		3.13		3.253		--	
Volumetric flow rate, dscfm	36061.5		35471.0		34162.6		35231.700		--	
Metal:	mg	lb/hr	mg	lb/hr	mg	lb/hr	mg	lb/hr	lb/hr	
Cadmium	0.0012	6.45E-05	0.00211	1.14E-04	0.00247	1.32E-04	1.93E-03	1.04E-04	0.0012	
Lead	0.36934	1.99E-02	0.26737	1.44E-02	0.23446	1.26E-02	2.90E-01	1.56E-02*	0.008	

mg: milligrams
lb/hr: pounds per hour

* Kearny Steel Container Corp. is currently assessing potential causes of the higher lead emission, and options for reducing this emission. Potential causes may include lead in the Newark water supply used in the furnace, and possibly lead paint on drums from foreign country sources that may not have restrictions on the use of lead paint.

**TABLE 4-4
RESULTS SUMMARY TOTAL PM EMISSIONS
KEARNY STEEL CONTAINER
DRUM RECLAIMING FURNACE OUTLET**

Run	1	2	3	Average	Emission Limit
Date:	9/18/19	9/18/19	9/18/19	--	--
Time:	0500-0645	0730-0914	0940-1124	--	--
Process Data:					
Drums per hour	300	300	300	300	--
Afterburner temperature, °F	1528.28	1542.48	1564.91	1545.22	--
O ₂ , %	16.06	16.58	16.32	16.32	--
Flue Gas:					
O ₂ , % volume dry	19.1078	19.2657	19.0678	19.147	--
CO ₂ , % volume dry	1.1023	1.0033	1.1126	1.073	--
Flue gas temperature °F	445.16	452.16	464.28	453.867	--
Moisture content, % volume	2.39	2.63	2.88	2.633	--
Volumetric flow rate, dscfm	35342.7	35545.4	35139.9	35342.667	--
Filterable PM Emissions:					
grains/dscf	9.77E-04	2.73E-03	3.69E-03	2.47E-03	--
lb/hour	2.96E-01	8.31E-01	1.11E+00	7.46E-01	2.8
Total PM (Filterable and Condensable) Emissions:					
grains/dscf	1.89E-03	3.85E-03	5.42E-03	3.72E-03	--
lb/hour	5.73E-01	1.17E+00	1.63E+00	1.12E+00	4.1

%: percent

°F: degrees Fahrenheit

dscfm: dry standard cubic feet per minute

grains/dscf: grains per dry standard cubic foot

lb/hour: pounds per hour