

# Compare Results

Old File:

**████\_BOP210001\_Apr 13 2023.pdf**

194 pages (754 KB)  
12/27/23 2:03:14 PM

versus

New File:

**████\_BOP220001\_Apr 27 2023.pdf**

202 pages (779 KB)  
12/27/23 2:04:11 PM

Total Changes

1106

Text only comparison

Content

827 Replacements  
114 Insertions  
165 Deletions

Styling and Annotations

0 Styling  
0 Annotations

Go to First Change (page 1)

Summary of Comments on Microsoft Word -

██████\_BOP220001\_33113130.docx

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This page contains no comments

2 OP220001




Date: 1/27/2023

New Jersey Department of Environmental Protection  
Facility Specific Requirements

Subject Item: FC

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	General Provisions: The permittee shall comply with all applicable provisions of N.J.A.C. 7:27-1. [N.J.A.C. 7:27- 1]	None.	None.	None.
2	Control and Prohibition of Open Burning: The permittee is prohibited from open burning of rubbish, garbage, trade waste, buildings, structures, leaves, other plant life and salvage. Open burning of infested plant life or dangerous material may only be performed with a permit from the Department. [N.J.A.C. 7:27- 2]	None.	None.	Obtain an approved permit: Prior to occurrence of event (prior to open burning). [N.J.A.C. 7:27- 2]
3	Prohibition of Air Pollution: The permittee shall not emit into the outdoor atmosphere substances in quantities that result in air pollution as defined at N.J.A.C. 7:27-5.1. [N.J.A.C. 7:27- 5]	None.	None.	None.
4	Prevention and Control of Air Pollution Control Emergencies: Any person responsible for the operation of a source of air contamination set forth in Table 1 of N.J.A.C. 7:27-12 is required to prepare a written Standby Plan, consistent with good industrial practice and safe operating procedures, and be prepared for reducing the emission of air contaminants during periods of an air pollution alert, warning, or emergency. Any person who operates a source not set forth in Table 1 of N.J.A.C. 7:27-12 is not required to prepare such a plan unless requested by the Department in writing. [N.J.A.C. 7:27-12]	None.	None.	Comply with the requirement: Upon occurrence of event. Upon proclamation by the Governor of an air pollution alert, warning, or emergency, the permittee shall put the Standby Plan into effect. In addition, the permittee shall ensure that all of the applicable emission reduction objectives of N.J.A.C. 7:27-12.4, Table I, II, and III are complied with whenever there is an air pollution alert, warning, or emergency. [N.J.A.C. 7:27-12]
5	Emission Offset Rules: The permittee shall comply with all applicable provisions of Emission Offset Rules. [N.J.A.C. 7:27-18]	None.	None.	None.
6	Emission Statements: The permittee shall comply with all the applicable provisions of N.J.A.C. 7:27-21. [N.J.A.C. 7:27-21]	None.	None.	None.

FC

	Number: 1 [Old]: "4/12/2021" [New]: "4/27/2023"	Author: Text Replaced	Subject: Text	Date: Indeterminate
	Number: 2 [Old]: "BOP210001" [New]: "BOP220001"	Author: Text Replaced	Subject: Text	Date: Indeterminate
	Number: 3 [Old]: "194" [New]: "202"	Author: Text Replaced	Subject: Text	Date: Indeterminate




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Date: 1/27/2023

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

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
7	Compliance Certification: The permittee shall submit an annual Compliance Certification for each applicable requirement, pursuant to N.J.A.C. 7:27-22.19(f). [N.J.A.C. 7:27-22]	None.	None.	Submit an Annual Compliance Certification: Annually to the Department and to EPA within 60 days after the end of each calendar year during which this permit was in effect. The Compliance Certification shall be certified pursuant to N.J.A.C. 7:27-1.39 by the responsible official and submitted electronically through the NJDEP online web portal. The certification should be printed for submission to EPA.  The NJDEP online web portal can be accessed at: <a href="http://www.state.nj.us/dep/online/">http://www.state.nj.us/dep/online/</a> . The Compliance Certification forms and instructions for submitting to EPA are available by selecting Documents and Forms and then Periodic Compliance Certification. [N.J.A.C. 7:27-22]
8	Prevention of Air Pollution from Consumer Products and Architectural Coatings: The permittee shall comply with all applicable provisions of N.J.A.C. 7:27-24 and [N.J.A.C. 7:27-23]	None.	None.	None.
9	Any operation of equipment which causes off-property effects, including odors, or which might reasonably result in citizen's complaints shall be reported to the Department to the extent required by the Air Pollution Control Act, N.J.S.A. 26:2C-19(e). [N.J.S.A. 26: 2C-19(e)]	Other: Observation of plant operations. [N.J.S.A. 26: 2C-19(e)].	Other: Maintain a copy of all information submitted to the Department. [N.J.S.A. 26: 2C-19(e)].	Notify by phone: Upon occurrence of event. A person who causes a release of air contaminants in a quantity or concentration which poses a potential threat to public health, welfare or the environment or which might reasonably result in citizen complaints shall immediately notify the Department. Such notification shall be made by calling the Environmental Action Hotline at (877) 927-6337. [N.J.S.A. 26: 2C-19(e)]
10	Prevention of Significant Deterioration: The permittee shall comply with all applicable provisions of Prevention of Significant Deterioration (PSD). [40 CFR 52.21]	None.	None.	None.

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	Number: 2 [Old]: "BOP210001" [New]: "BOP220001"	Author: Text Replaced	Subject: Text	Date: Indeterminate
	Number: 3 [Old]: "194" [New]: "202"	Author: Text Replaced	Subject: Text	Date: Indeterminate

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Date: 1/27/2023

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

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	The permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Asbestos, Subpart M. [40 CFR 61]	Other: Comply with 40 CFR 61.145 and 61.150 when conducting any renovation or demolition activities at the facility. [40 CFR 61].	Other: Comply with 40 CFR 61.153 when conducting any renovation or demolition activities at the facility. [40 CFR 61].	Comply with the requirement: Upon occurrence of event. The permittee shall comply with 40 CFR 61.153 when conducting any renovation or demolition activities at the facility. [40 CFR 61]
12	Protection of Stratospheric Ozone: 1) If the permittee manufactures, transforms, destroys, imports, or exports a Class I or Class II substance, the permittee is subject to all the requirements as specified at 40 CFR 82, Subpart A; 2) If the permittee performs a service on motor "fleet" vehicles when this service involves an ozone depleting substance refrigerant (or regulated substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified at 40 CFR 82, Subpart B. 3) The permittee shall comply with the standards for labeling of products containing or manufactured with ozone depleting substances pursuant to 40 CFR 82, Subpart E. 4) The permittee shall comply with the standards for recycling and emission reductions of Class I and Class II refrigerants or a regulated substitute substance during the service, maintenance, repair, and disposal of appliances pursuant to 40 CFR 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B. 5) The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program (SNAP) promulgated pursuant to 40 CFR 82, Subpart G. [40 CFR 82]	Other: Comply with 40 CFR 82 Subparts A, B, E, F, and G. [40 CFR 82].	Other: Comply with 40 CFR 82 Subparts A, B, E, F, and G. [40 CFR 82].	Comply with the requirement: Upon occurrence of event. The permittee shall comply with 40 CFR 82 Subparts A, B, E, F, and G. [40 CFR 82]

	Number: 1 [Old]: "4/12/2021" [New]: "4/27/2023"	Author: Text Replaced	Subject: Text	Date: Indeterminate
	Number: 2 [Old]: "BOP210001" [New]: "BOP220001"	Author: Text Replaced	Subject: Text	Date: Indeterminate
	Number: 3 [Old]: "194" [New]: "202"	Author: Text Replaced	Subject: Text	Date: Indeterminate








Date: 4/27/2023

BOP220001

New Jersey Department of Environmental Protection  
Facility Specific Requirements

Subject Item: IS8 - 260 GALLON DIESEL TANK, IS28 - 250 Gallon Oil Tank, IS29 - 500 Gallon Oil Tank, IS30 - 250 Gallon Oil Tank, IS32 - 250 Gallon Oil Tank, IS56 3,500 Gallon Fuel Oil Tank, IS61 (1) Emergency Generator ULSD Tank (275 gallons)

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Sulfur Content in Fuel $\leq$ 15 ppmv (0.0015 % by weight). Maximum allowable sulfur content in No. 2 and lighter fuel oil. [N.J.A.C. 7:27- 9.2(a)]	None.	None.	None.
2	Fuel stored in New Jersey that met the applicable maximum sulfur content standard of Tables 1A or 1B of N.J.A.C. 7:27-9.2 at the time it was initially stored in New Jersey may be used in New Jersey after the operative date of the applicable standard in Table 1B. [N.J.A.C. 7:27- 9.2(a)]	None.	None.	None.

	Number: 1	Author: Text Inserted	Subject: Text	Date: Indeterminate
	[REDACTED] BOP220001 Date: 4/27/2023 New Jersey Department of Environmental Protection Facility Specific Requirements"			
	Number: 2	Author: Text Inserted	Subject: Text	Date: Indeterminate
	"Tank, IS61 (1) Emergency Generator ULSD Tank (275 gallons)"			
	Number: 3	Author: Text Replaced	Subject: Text	Date: Indeterminate
	[Old]: "(0.0015% by weight). Effective July 1, 2016. [N.J.A.C. 7:27-9.2(a)] Sulfur Content in Fuel: Monitored by review of fuel delivery records per delivery showing fuel sulfur content. [N.J.A.C. 7:27-22.16(o)] Sulfur Content in Fuel: Recordkeeping by invoices / bills of lading / certificate of analysis per delivery showing fuel sulfur content. [N.J.A.C. 7:27-22.16(o)] None. 2 Fuel stored in New Jersey that met the applicable maximum sulfur content standard of Tables 1A or 1B of N.J.A.C. 7:27-9.2 at the time it was"			
	[New]: "(0.0015 % by weight). Maximum allowable sulfur content in No. 2 and lighter fuel oil. [N.J.A.C. 7:27-9.2(a)] None. None. 2 Fuel stored in New Jersey that met the applicable maximum sulfur content standard of Tables 1A or 1B of N.J.A.C. 7:27-9.2 at the time it was initially"			
	Number: 4	Author: Text Replaced	Subject: Text	Date: Indeterminate
	[Old]: "6"			
	[New]: "7"			
	Number: 5	Author: Text Replaced	Subject: Text	Date: Indeterminate
	[Old]: "194"			
	[New]: "202"			

	Number: 1	Author: Text Replaced	Subject: Text	Date: Indeterminate
	[Old]: "4/12/2021" [New]: "4/27/2023"			
	Number: 2	Author: Text Replaced	Subject: Text	Date: Indeterminate
	[Old]: "BOP210001" [New]: "BOP220001"			
	Number: 3	Author: Text Inserted	Subject: Text	Date: Indeterminate
	"Subject Item: IS62 (1) Non-contact cooling tower < 50 lb/hr raw materials"			
	Number: 4	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"MARCAL MANUFACTURING LLC (02102) BOP210001 Date: 4/12/2021 New Jersey Department of Environmental Protection Facility Specific Requirements"			
	Number: 5	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"Applicable Requirement Ref.# Monitoring Requirement Recordkeeping Requirement Submittal/Action Requirement None."			
	Number: 6	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"6"			
	Number: 7	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"[N.J.A.C.]"			
	Number: 8	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"[N.J.A.C.]"			
	Number: 9	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"[N.J.A.C.]"			
	Number: 10	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"Ref.# Applicable Requirement Monitoring Requirement Recordkeeping Requirement Submittal/Action Requirement 5"			
	Number: 11	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"7:27-19.16(d)] and [N.J.A.C. 7:27-19.16(c)]"			
	Number: 12	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"[N.J.A.C.]"			
	Number: 13	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"7:27-19.16(b)] Submit a report: Annually. The owner or operator shall submit an annual adjustment combustion process report to the department within 45 days after the adjustment of the combustion process is completed. The report shall be submitted electronically to: <a href="http://www.njdeponline.com">www.njdeponline.com</a> . Instructions for submitting this report online are specified at: <a href="http://www.nj.gov/dep/aqpp/adjustment.htm">http://www.nj.gov/dep/aqpp/adjustment.htm</a> ."			
	Number: 14	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"The owner or operator of an industrial/commercial/institutional boiler or other indirect heat exchanger with a gross heat input of at least five million BTU per hour or more shall adjust the combustion process annually in the same quarter of each calendar year. The adjustment of the combustion process shall be done in accordance with the procedure set forth at N.J.A.C. 7:27-19.16."			
	Number: 15	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"7:27-16.8(b)], [N.J.A.C. 7:27-16.8(c)] and [N.J.A.C. 7:27-19.7(g)] Monitored by periodic emission monitoring annually. The owner or operator shall perform the adjustment of the combustion process in accordance with the specific procedures for combustion adjustment monitoring specified in NJDEP Technical Manual 1005 and the procedure set forth at N.J.A.C. 7:27-19.16(a) as follows: 1. Inspect the burner, and clean or replace any components of the burner as necessary; 2. Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern consistent with the manufacturer's specifications; 3. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly; 4. Minimize the total emissions of NOx and CO consistent with the manufacturer's specifications; 5. Measure the concentrations in the effluent stream of NOx, CO and O2 in ppmvd, before and after the adjustment is made; and 6. Convert the emission values of NOx, CO and O2 concentrations measured in lb/MMBTU according to the following formula: $Lb/MMBTU = ppmvd * MW * F \text{ dry factor} * O2 \text{ correction factor} / 387,000,000$ , where: ppmvd is the concentration in parts per million by volume, dry basis, of NOx or CO; MW is the Molecular Weight for NOx=46 lb/lb-mole, CO=28lb/lb-mole; F Dry factor for: Natural Gas = 8,710 dscf/MMBTU, Residual or fuel oil = 9,190 dscf/MMBTU; O2 correction factor: $(20.9\%)/(20.9\% - O2 \text{ measured})$ , where O2 measured is percent oxygen on a dry basis."			
	Number: 16	Author: Text Deleted	Subject: Text	Date: Indeterminate
	"7:27-19.16(a)] Recordkeeping by manual logging of parameter or storing data in a computer data system upon performing combustion adjustment of the following information for each adjustment: 1. The date of the adjustment and the times at which it began and ended; 2. The name, title and affiliation of the person who made the adjustment; 3. The NOx and CO concentrations in the effluent stream, in ppmvd, before and after each actual adjustment was made; 4. The concentration of O2 (in percent dry basis) at which the CO and NOx concentrations were measured; 5. A description of any corrective action taken; 6. Results from any subsequent test performed after taking any corrective action, including concentrations and converted emission values in (lb/MMBTU); 7. The type and amount of fuel used over the 12 months prior to the annual adjustment; 8. Any other information which the Department or the			

[REDACTED]

## New Jersey Department of Environmental Protection Facility Specific Requirements

**Subject Item:**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	18 Calculate Emissions 17 6.5(b)(5) 19 20 21 22 23 24 25 26 27 28 29 30 31	None.	None.	None.
2	Opacity may be no greater than 20% exclusive of visible condensed water, except 34 a period of not longer than 3 minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-6.2(d)] & [N.J.A.C. 7:27- 6.2(e)] 35	None. 33	None.	None. 32



EPA has required as a condition of approval of any permit or certificate issued for the source operation. The records must be retained for a minimum of five years and to be made readily accessible to the Department upon request."

	Number: 17	Author: Text Replaced	Subject: Text	Date: Indeterminate
[Old]: "The owner or operator of the adjusted equipment or source operation shall ensure that the operating parameter settings are established and recorded after the combustion process is adjusted and that the adjusted equipment or source operation is maintained to operate consistent with the annual adjustment. [N.J.A.C. 7:27-19.16(e)] Other: Monitored by the operating parameter settings that are established after the combustion process is adjusted in order to operate consistent with the annual adjustment. [N.J.A.C. 7:27-19.16(e)]. Other: The owner or operator shall record the operating parameter settings that are established after the combustion process is adjusted and retain until the next annual adjustment, to be made readily accessible to the Department upon request. [N.J.A.C. 7:27-19.16(e)]. VOC (Total) <= 4.22 tons/yr. . Maximum annual emission limit for both boilers based on the worst case fuel usage limits in operating permit modification application. [N.J.A.C. 7:27-22.16(a)] None. None. None." [New]: "<= 0.5 lb/hr . [N.J.A.C. 7:27-6.2(a)] None. None. None. 2 Opacity may be no greater than 20% exclusive of visible condensed water, except"				
	Number: 18	Author: Text Replaced	Subject: Text	Date: Indeterminate
[Old]: "3" [New]: "1 Particulate Emissions"				
	Number: 19	Author: Text Deleted	Subject: Text	Date: Indeterminate
"See stack testing requirements specified in U1, OS Summary for details. [N.J.A.C. 7:27-22.16(o)] Stack Test -Submit protocol, conduct test and submit results: As per the approved schedule. See stack testing requirements specified in U1, OS Summary for details. [N.J.A.C. 7:27-22.16(o)]"				
	Number: 20	Author: Text Deleted	Subject: Text	Date: Indeterminate
"7:27-16.22. See stack testing requirements specified in U1, OS Summary for details. [N.J.A.C. 7:27-22.16(o)]"				
	Number: 21	Author: Text Deleted	Subject: Text	Date: Indeterminate
"[N.J.A.C."				
	Number: 22	Author: Text Deleted	Subject: Text	Date: Indeterminate
"See stack testing requirements specified in U1, OS Summary for details. [N.J.A.C. 7:27-22.16(o)] Stack Test -Submit protocol, conduct test and submit results: As per the approved schedule. See stack testing requirements specified in U1, OS Summary for details. [N.J.A.C. 7:27-22.16(o)] 4"				
	Number: 23	Author: Text Deleted	Subject: Text	Date: Indeterminate
"7:27-16.22. See stack testing requirements specified in U1, OS Summary for details. [N.J.A.C. 7:27-22.16(o)]"				
	Number: 24	Author: Text Deleted	Subject: Text	Date: Indeterminate
"[N.J.A.C."				
	Number: 25	Author: Text Deleted	Subject: Text	Date: Indeterminate
"VOC (Total) <= 50 ppmvd @ 7% O2 for each boiler."				
	Number: 26	Author: Text Deleted	Subject: Text	Date: Indeterminate
"7:27-16.8(b)1] VOC (Total): Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs performed in compliance with N.J.A.C."				
	Number: 27	Author: Text Deleted	Subject: Text	Date: Indeterminate
"VOC (Total): Recordkeeping by stack test results prior to permit renewal."				
	Number: 28	Author: Text Deleted	Subject: Text	Date: Indeterminate
"CO <= 100 ppmvd @ 7% O2 for each boiler."				
	Number: 29	Author: Text Deleted	Subject: Text	Date: Indeterminate
"7:27-16.8(b)2] CO: Monitored by stack emission testing prior to permit renewal, based on the average of three Department validated stack test runs performed in compliance with N.J.A.C."				
	Number: 30	Author: Text Deleted	Subject: Text	Date: Indeterminate
"CO: Recordkeeping by stack test results prior to permit renewal."				
	Number: 31	Author: Text Deleted	Subject: Text	Date: Indeterminate
"U1 -Boilers 12 & 13 -114 and 147 MMBtu/hr (Derated for Oil to 99 MMBtu OS Summary Page 17 of 194"				
	Number: 32	Author: Text Deleted	Subject: Text	Date: Indeterminate
"10"				
	Number: 33	Author: Text Deleted	Subject: Text	Date: Indeterminate
"7"				
	Number: 34	Author: Text Replaced	Subject: Text	Date: Indeterminate
[Old]: "NOx (Total) <= 157 tons/yr. Maximum annual emission limit for both boilers based on the worst case fuel usage limits in operating permit modification application. [N.J.A.C. 7:27-22.16(a)] None. None. None." [New]: "for a period of not longer than 3 minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-6.2(d)] &."				
	Number: 35	Author: Text Deleted	Subject: Text	Date: Indeterminate
"9"				