



15 Roszel Rd, Ste 105, Princeton, NJ 08540 / P 609.318.5500 / trinityconsultants.com

SUBMITTED VIA NJDEP ONLINE

May 1, 2023

NJDEP – Air Quality Permitting and Planning
Bureau of Stationary Sources
Preconstruction Permits Section
401 E. State St, 2nd Floor, PO Box 420
Trenton, NJ 08625-0420

*RE: Patrick J. Kelly Drums, Inc. (PI #52555)
1810 River Ave., Camden City, NJ 08105
Preconstruction Permit Application*

Dear Sir/Madam:

On behalf of Patrick J. Kelly Drums, Inc. (PJK), Trinity Consultants Inc. (Trinity) has prepared this preconstruction permit application for its poly drum and tote reconditioning operations including washing and shredding at the 1810 River Ave., Camden City, NJ (PI # 52555) facility.

REASON FOR APPLICATION

The PJK facility currently operates a poly drum and tote reconditioning operation which includes washing and shredding activities at the River Avenue facility. The drums arrive onsite formerly containing low or non-VOC / non-HAP materials. Upon receipt, any residual contents are poured off and collected for disposal. The poly drums come in either open headed or closed (with bung opening) and the totes arrive in varying condition which will determine the final processing.

Following an inspection, the NJDEP indicated that these source operations require a preconstruction permit and requested that PJK submit an application to register them with the State. This preconstruction permit (PCP) application is being submitted to NJDEP to add the poly drum/tote washing and shredding operations along with the corresponding emission points include (NJID# U10 / E10,11,12,13,14,15,16 / PT10,11,12,13,14,15,16,17,18,19,20,21). The detailed potential-to-emit calculations and regulatory applicability review are provided in the sections below.

POTENTIAL EMISSIONS

The air pollutant Potential-to-Emit (PTE) for this operation has been calculated based on internal emissions testing conducted to evaluate the process. It is anticipated that the NJDEP will require formal VOC emissions testing as part of the approval of the preconstruction permit. The emissions calculations are based on the maximum tested emission rate for each the washing operations and shredding operations plus a 20% safety factor. Detailed PTE calculations are included in **Attachment 2**.

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

REGULATORY REVIEW

New Source Performance Standards

The New Source Performance Standards (NSPS) codified in 40 CFR Part 60 require that new, modified or reconstructed sources control emissions to the level achievable by the best-demonstrated technology as specified by the applicable provisions. The facility source operations (poly drum and tote washing and shredding) contained in this application are not covered under any of the 40 CFR Part 60 standards. Hence, the facility source operations are not subject to NSPS.

National Emissions Standards for Hazardous Air Pollutants

National Emission Standards for Hazardous Air Pollutants (NESHAP) are emission standards for HAPs, regulated by 40 CFR Part 61 and 63. NESHAP regulations apply to sources in specifically regulated industrial source classifications (Clean Air Act Section 112(d)) or on a case-by-case basis (Clean Air Act Section 112(g)) for facilities not regulated as a specific industrial source type. The facility source operations (poly drum washing and shredding) are not covered under any of the 40 CFR Part 61 or 63 standards. Hence, the facility source operations are not subject to NESHAP requirements.

New Jersey Administrative Code

Air emissions from the PJK facility are subject to certain regulations from Chapter 7:27 of the New Jersey Administrative Code (N.J.A.C.). The applicability of N.J.A.C. Chapter 7:27 to the projects is evaluated in the following sections.

N.J.A.C. 7:27-6 – Control and Prohibition of Particles from Manufacturing Processes (Subchapter 6)

N.J.A.C. 7:27-6 requires source operations at a facility to limit particulate emissions from any sources operation, through any stack or chimney into the outdoor air in excess of the maximum allowable emission rate as determined under N.J.A.C. 7:27-6.2(a). The poly drum and tote reconditioning washing operation utilizes water to wash the drums which had previously stored liquids. The shredding operation essentially cuts the pre-washed, wet poly drums and totes into smaller plastic pieces. Therefore, particulate emissions will be negligible from this operation and will ensure compliance with Subchapter 6.

N.J.A.C. 7:27-8 - Permits and Certificates (Subchapter 8)

N.J.A.C. 7:27-8 requires a preconstruction permit to be obtained for poly drum and tote washing and shredding operations due to the fact that greater than 50 lbs/hr of raw materials (poly drums and totes) are processed. This permit modification application seeks to apply for a preconstruction permit pursuant to Subchapter 8 for this operation.

N.J.A.C. 7:27-16 - Control and Prohibition of Air Pollution by Volatile Organic Compounds (Subchapter 16)

The proposed steel drum reconditioning activities in this application are subject to the VOC RACT rule under N.J.A.C. 7:27-16.16 (Other source operations). N.J.A.C. 7:27-16.16, Tables 16 A&B provide the applicable maximum allowable VOC emission rates for the facility source operations based on vapor pressure. This source operation will comply with the VOC RACT requirements as evidenced by the fact that the VOC emission rate is below the reporting threshold of 3.5 lb/hr.

N.J.A.C. 7:27-17 - Control and Prohibition of Air Pollution by Toxic Substances and Hazardous Air Pollutants (Subchapter 17)

N.J.A.C. 7:27-17 applies to operations or equipment, but not be limited to, storage tanks, transfer operations, open top tanks, surface cleaning, surface coating, organic chemical manufacture, pharmaceutical manufacture, petroleum refining, and miscellaneous organic solvent uses in which one or more of the Group 1 or Group 2 air toxics (TXS) listed under N.J.A.C. 7:27-17, Table 1 are stored, used, or manufactured. The drum reconditioning operations at the facility do not use any of the Group 1 or Group 2 air toxic and thus not subject to Subchapter 17 for TXS.

N.J.A.C. 7:27-17, Table 2 provides the reportable threshold and SOTA threshold for the hazardous air pollutants (HAPs). The NJDEP requires that a first-level screening be provided with every permit application for any HAP with potential emissions above its NJDEP established reporting threshold. This operation does not have the potential to emit any HAP above the listed reporting thresholds and therefore will not be required to assess health risk and SOTA.

N.J.A.C. 7:27-22 - Operating Permits (Subchapter 22)

N.J.A.C. 7:27-22 applies to facilities that have the potential to emit greater than 25 tpy of NOX or VOC, greater than 10 tpy of a single HAP, 25 tpy of total HAPs or 100 tpy of any other contaminant. Since the facility-wide potential to emit is less than 25 tpy of NOX or VOC, less than 10 tpy of a single HAP, 25 tpy of total HAPs or 100 tpy of any other contaminant, the facility is not required to obtain a Title V operating permit.

State of the Art (SOTA) Analysis

As per N.J.A.C.7:27-8.12(a), an application shall include a SOTA analysis for any newly constructed, reconstructed, or modified equipment and control apparatus which constitutes a significant source operation, if the PTE is above the applicability thresholds. As indicated in Attachment 2, the PTE for VOC is below the reporting thresholds and thus does not exceed the State of the Art (SOTA) applicability thresholds as per N.J.A.C. 7:27-8, Appendix 1, Table A (for Criteria Pollutants). Therefore, SOTA does not apply to this source operation.

The RADIUS application (**Attachment 1**) along with the appendices is being submitted & certified (by the Responsible Official & Individual with Direct Knowledge) via NJDEP Online.

If you have any questions or comments about the information presented in this letter, please feel free to contact Ed Bash of Patrick J. Kelly (ed.bash@kellydrums.com, 800.963.1795 x 706) or me (jkwiatkowski@trinityconsultants.com, 609.318.5500 x 1754) should you have any questions or comments regarding this application.

Sincerely,

TRINITY CONSULTANTS

A handwritten signature in black ink, appearing to read "Joseph J. Kwiatkowski". The signature is fluid and cursive, with the first name "Joseph" and last name "Kwiatkowski" clearly distinguishable.

Joseph J. Kwiatkowski
Managing Consultant

Attachments

cc: Mr. Ed Bash, Patrick J. Kelly Drums, Inc.

ATTACHMENT 1
RADIUS APPLICATION

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

Permit Being Modified

Permit Class: **Number:**0

Description of Modifications: The PJK facility currently operates a poly drum and tote reconditioning operation which includes washing and shredding activities at the River Avenue facility. The drums arrive onsite formerly containing low or non-VOC / non-HAP materials. Upon receipt, any residual contents are poured off and collected for disposal. The poly drums come in either open headed or closed (with bung opening) and the totes arrive in varying condition which will determine the final processing.

Following an inspection, the NJDEP indicated that these source operations require a preconstruction permit and requested that PJK submit an application to register them with the State. This preconstruction permit (PCP) application is being submitted to NJDEP to add the poly drum/tote washing and shredding operations along with the corresponding emission points include (NJID# U10 / E10,11, 12, 13, 14, 15, 16 / PT10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21).

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

Facility Name (AIMS): Patrick J. Kelly Drums, Inc.

Facility ID (AIMS): 52555

Street 1810 RIVER AVE
Address: CAMDEN, NJ 08096

Mailing 1810 RIVER AVE
Address: CAMDEN, NJ 08096

County: Camden
Location
Description:

State Plane Coordinates:	
X-Coordinate:	324,494
Y-Coordinate:	407,298
Units:	New Jersey State Plane 8
Datum:	NAD83
Source Org.:	xAddress Match
Source Type:	Exact Address Match

Industry:	
Primary SIC:	
Secondary SIC:	
NAICS:	332439

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

Contact Type: Air Permit Information Contact**Organization:** Patrick J. Kelly Drums, Inc.**Org. Type:** Corporation**Name:** Ed Bash**NJ EIN:****Title:** Regulatory Compliance Manager**Phone:** (800) 963-1795 x0706**Mailing Address:** 2109 Howell St
Camden, NJ 08105**Fax:** (856) 365-8796 x**Other:** (609) 352-0841 x**Type:** Mobile**Email:** Ed.bash@kellydrums.com

Contact Type: Consultant**Organization:** Trinity Consultants Inc.**Org. Type:** Corporation**Name:** Joseph J. Kwiatkowski**NJ EIN:****Title:** Managing Consultant**Phone:** (609) 318-5500 x1754**Mailing Address:** 15 Roszel Road
Suite 105
Princeton, NJ 08540**Fax:** () - x**Other:** () - x**Type:****Email:** jkwiatkowski@trinityconsultants.com

Contact Type: Fees/Billing Contact**Organization:** Patrick J. Kelly Drums, Inc.**Org. Type:** Corporation**Name:** Ed Bash**NJ EIN:****Title:** Regulatory Compliance Manager**Phone:** (800) 963-1795 x0706**Mailing Address:** 2109 Howell St
Camden, NJ 08105**Fax:** (856) 365-8796 x**Other:** (609) 352-0841 x**Type:** Mobile**Email:** Ed.bash@kellydrums.com

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

Contact Type: Responsible Official

Organization: Patrick J. Kelly Drums, Inc.

Org. Type: Corporation

Name: Ed Bash

NJ EIN:

Title: Regulatory Compliance Manager

Phone: (800) 963-1795 x0706

Mailing Address: 2109 Howell St
Camden, NJ 08105

Fax: (856) 365-8796 x

Other: (609) 352-0841 x

Type: Mobile

Email: Ed.bash@kellydrums.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
E10	RA-TotePre	River A - Tote Prewash	Manufacturing and Materials Handling Equipment		1/1/2007	No		
E11	RA-ToteShred	River A - Tote Shredding	Manufacturing and Materials Handling Equipment		1/1/2007	No		
E12	RA-ToteWash	River A - Tote Washing	Manufacturing and Materials Handling Equipment		1/1/2001	No		
E13	RB-ClosePoly	River B - Closed-Head Poly Drum Wash	Manufacturing and Materials Handling Equipment		1/1/2018	No		
E14	RB-OpenPoly	River B - Open-Head Poly Drum Wash	Manufacturing and Materials Handling Equipment		1/1/2018	No		
E15	RB-PolyPre	River B - Poly Drum Prewash	Manufacturing and Materials Handling Equipment		1/1/2013	No		
E16	RB-PolyShred	River B - Poly Drum Shred	Manufacturing and Materials Handling Equipment		1/1/2013	No		

000000 E10 (Manufacturing and Materials Handling Equipment)
Print Date: 4/30/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Tote Prewash Station"/>
Capacity:	<input type="text" value="3.30E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="totes/day"/>
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 E11 (Manufacturing and Materials Handling Equipment)
Print Date: 4/30/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Tote Shredder"/>
Capacity:	<input type="text" value="3.30E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="totes/day"/>
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 E12 (Manufacturing and Materials Handling Equipment)
Print Date: 4/30/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Tote Washing"/>
Capacity:	<input type="text" value="2.20E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="Totes/day"/>
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 E13 (Manufacturing and Materials Handling Equipment)
Print Date: 4/30/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly Drum Washing"/>
Capacity:	<input type="text" value="6.00E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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 E14 (Manufacturing and Materials Handling Equipment)
Print Date: 4/30/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly Drum Washing"/>
Capacity:	<input type="text" value="6.00E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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 E15 (Manufacturing and Materials Handling Equipment)
Print Date: 4/30/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly drum prewash (before shred)"/>
Capacity:	<input type="text" value="5.60E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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 E16 (Manufacturing and Materials Handling Equipment)
Print Date: 4/30/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly Drum Shredding"/>
Capacity:	<input type="text" value="5.60E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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:	

**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.		
PT10	River A Roof	River A Roof Fan - Tote Wash	Round	36	24	30	65.0	40.0	90.0	9,000.0	9,000.0	9,000.0	Horizontal	
PT11	River A PreW	River A Tote Pre Wash	Round	14	28	30	65.0	40.0	90.0	1,800.0	1,800.0	1,800.0	Horizontal	
PT12	River A Shre	River A Shredder	Round	12	24	30	65.0	40.0	90.0	1,900.0	1,900.0	1,900.0	Horizontal	
PT13	River B #1	River B Wall #1	Round	36	20	150	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT14	River B #2	River B Wall #2	Round	36	20	130	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT15	River B #3	River B Wall #3	Round	36	20	110	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT16	River B #4	River B Wall #4	Round	36	20	90	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT17	River B #5	River B Wall #5	Round	36	20	70	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT18	River B #6	River B Wall #6	Round	36	20	50	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT19	River B PreW	River B Pre-Wash	Round	14	28	40	65.0	40.0	90.0	1,800.0	1,800.0	1,800.0	Horizontal	
PT20	River B Sh1	River B Shredder Stack1	Round	12	27	20	65.0	40.0	90.0	500.0	500.0	500.0	Horizontal	
PT21	River B Sh2	River B Shredder Stack2	Round	12	27	20	65.0	40.0	90.0	500.0	500.0	500.0	Horizontal	
PT22	River B Open	River B Open-Head	Round	14	28	75	65.0	40.0	90.0	1,800.0	1,800.0	1,800.0	Horizontal	

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

U 10 Drum-Tote Drum and Tote Washing & Shredding

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.
OS1	RA-TotePre	River A - Tote Prewash	Normal - Steady State	E10		PT11	3-08-999-99	0.0	2,500.0	A	0.0	1,800.0	40.0	90.0
OS2	RA-ToteShred	River A - Tote Shredding	Normal - Steady State	E11		PT12	3-08-999-99	0.0	2,500.0	A	0.0	1,900.0	40.0	90.0
OS3	RA-ToteWash	River A - Tote Washing	Normal - Steady State	E12		PT10	3-08-999-99	0.0	2,500.0	A	0.0	9,000.0	40.0	90.0
OS4	RB-ClosePoly	River B - Closed-Head Poly Drum Wash	Normal - Steady State	E13		PT13 PT14 PT15 PT16 PT17 PT18	3-08-999-99	0.0	2,500.0	A	0.0	10,500.0	40.0	90.0
OS5	RB-OpenPoly	River B - Open-Head Poly Drum Wash	Normal - Steady State	E14		PT22	3-08-999-99	0.0	2,500.0	A	0.0	1,800.0	40.0	90.0
OS6	RB-PolyPre	River B - Poly Drum Prewash	Normal - Steady State	E15		PT19	3-08-999-99	0.0	2,500.0	A	0.0	1,800.0	40.0	90.0
OS7	RB-PolyShred	River B - Poly Drum Shredding	Normal - Steady State	E16		PT20 PT21	3-08-999-99	0.0	2,500.0	A	0.0	1,000.0	40.0	90.0

**New Jersey Department of Environmental Protection
Potential to Emit**

Subject Item: U10 Drum-Tote

Operating Scenario: OS0 Summary

Step:

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			11.74000000	11.74000000	tons/yr	No

Subject Item: U10 Drum-Tote

Operating Scenario: OS1

Step:

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

Subject Item: U10 Drum-Tote

Operating Scenario: OS2

Step:

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			0.50000000	0.50000000	lb/hr	No

Subject Item: U10 Drum-Tote

Operating Scenario: OS3

Step:

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

**New Jersey Department of Environmental Protection
Potential to Emit**

Subject Item: U10 Drum-Tote**Operating Scenario:** OS4**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

Subject Item: U10 Drum-Tote**Operating Scenario:** OS6**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

Subject Item: U10 Drum-Tote**Operating Scenario:** OS7**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			0.50000000	0.50000000	lb/hr	No

ATTACHMENT 2

PTE CALCULATIONS

Poly Drum/Tote Washing & Shredding: Potential to Emit (PTE) Calculations

Stack Test Results ¹

Drum Washing		
<i>River A - Totes</i>		
East - Tote Prewash / Shred (Door #5)	1.40	lb/hr
East - Tote Shredder (A)	0.33	lb/hr
West - Tote Wash Line	-	lb/hr
<i>River B - Plastic Drums</i>		
East B - Closed-Head Poly Drum Wash	-	lb/hr
East B - Open-Head Poly Drum Wash (Door 12)	0.27	lb/hr
West B - Poly-Drum Prewash (Door 17)	1.14	lb/hr
West B - Poly-Drum Shredder (B)	0.058	lb/hr
VOC per wash station (max measured at any wash station)	1.40	lb/hr
Safety Factor 20%	1.68	lb/hr
VOC per shred station (max measured at either wash station)	0.33	lb/hr
Safety Factor 50%	0.50	lb/hr

Operational Throughput		
Max. Annual Poly Drums Washed	600	drums/day
Max. Annual Totes Washed	220	drums/day
Max. Annual Drums Shredded	330	drums/day
Max. Annual Totes Shredded	560	drums/day
Max. Hours of Operation ²	2500	hr/yr

Hourly Emissions (lb/hr)

Washing or Shredding Station	Potential to Emit (lb/hr)
	VOC
River A East Tote Prewash	1.68
River A East Tote Shred	0.50
River A West Tote Wash	1.68
River B East Closed-Head Poly Drum Wash	1.68
River B East Open-Head Poly Drum Wash	1.68
River B West Poly-Drum Prewash	1.68
River B West Poly-Drum Shred	0.50

Drum Washing Station	Potential to Emit (TPY)
	VOC
River A East Tote Prewash	2.10
River A East Tote Shred	0.62
River A West Tote Wash	2.10
River B East Closed-Head Poly Drum Wash	2.10
River B East Open-Head Poly Drum Wash	2.10
River B West Poly-Drum Prewash	2.10
River B West Poly-Drum Shred	0.62
Annual Emissions	11.74
Reportable Thresholds ^{3,4}	0.05
SOTA Thresholds ^{3,4}	5
Emissions Above Reportable Threshold	Yes
Emissions Above SOTA Threshold	No

Notes:

1. Information pertaining to tote / poly drum washing & shredding operations VOC emissions provided by internal test results.
2. Hours of operation provided by client
3. The reporting threshold (in lbs/hr) and SOTA thresholds (in tpy) for criteria pollutants as per N.J.A.C 7:27 Subchapter 8, Appendix 1- Table A.
4. The reporting threshold and SOTA thresholds (in lb/yr) for HAPs as per N.J.A.C 7:27 Subchapter 17, Table 3A.

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

Permit Being Modified

Permit Class: **Number:** 0

Description of Modifications: The PJK facility currently operates a poly drum and tote reconditioning operation which includes washing and shredding activities at the River Avenue facility. The drums arrive onsite formerly containing low or non-VOC / non-HAP materials. Upon receipt, any residual contents are poured off and collected for disposal. The poly drums come in either open headed or closed (with bung opening) and the totes arrive in varying condition which will determine the final processing.

Following an inspection, the NJDEP indicated that these source operations require a preconstruction permit and requested that PJK submit an application to register them with the State. This preconstruction permit (PCP) application is being submitted to NJDEP to add the poly drum/tote washing and shredding operations along with the corresponding emission points include (NJID# U10 / E10, 11, 12, 13, 14, 15, 16 / PT10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21).

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

Facility Name (AIMS): Patrick J. Kelly Drums, Inc.

Facility ID (AIMS): 52555

Street 1810 RIVER AVE
Address: CAMDEN, NJ 08096

Mailing 1810 RIVER AVE
Address: CAMDEN, NJ 08096

County: Camden
Location
Description:

State Plane Coordinates:
X-Coordinate: 324,494
Y-Coordinate: 407,298
Units: New Jersey State Plane 8

Datum: NAD83
Source Org.: xAddress Match
Source Type: Exact Address Match

Industry:
Primary SIC:
Secondary SIC:
NAICS: 332439

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

Contact Type: Air Permit Information Contact

Organization: Patrick J. Kelly Drums, Inc.

Org. Type: Corporation

Name: Ed Bash

NJ EIN:

Title: Regulatory Compliance Manager

Phone: (800) 963-1795 x0706

Mailing Address: 2109 Howell St
Camden, NJ 08105

Fax: (856) 365-8796 x

Other: (609) 352-0841 x

Type: Mobile

Email: Ed.bash@kellydrums.com

Contact Type: Consultant

Organization: Trinity Consultants Inc.

Org. Type: Corporation

Name: Joseph J. Kwiatkowski

NJ EIN:

Title: Managing Consultant

Phone: (609) 318-5500 x1754

Mailing Address: 15 Roszel Road
Suite 105
Princeton, NJ 08540

Fax: () - x

Other: () - x

Type:

Email: jkwiatkowski@trinityconsultants.com

Contact Type: Fees/Billing Contact

Organization: Patrick J. Kelly Drums, Inc.

Org. Type: Corporation

Name: Ed Bash

NJ EIN:

Title: Regulatory Compliance Manager

Phone: (800) 963-1795 x0706

Mailing Address: 2109 Howell St
Camden, NJ 08105

Fax: (856) 365-8796 x

Other: (609) 352-0841 x

Type: Mobile

Email: Ed.bash@kellydrums.com

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

Contact Type: Responsible Official

Organization: Patrick J. Kelly Drums, Inc.

Org. Type: Corporation

Name: Ed Bash

NJ EIN:

Title: Regulatory Compliance Manager

Phone: (800) 963-1795 x0706

Mailing Address: 2109 Howell St

Fax: (856) 365-8796 x

Camden, NJ 08105

Other: (609) 352-0841 x

Type: Mobile

Email: Ed.bash@kellydrums.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
E10	RA-TotePre	River A - Tote Prewash	Manufacturing and Materials Handling Equipment		1/1/2007	No		
E11	RA-ToteShred	River A - Tote Shredding	Manufacturing and Materials Handling Equipment		1/1/2007	No		
E12	RA-ToteWash	River A - Tote Washing	Manufacturing and Materials Handling Equipment		1/1/2001	No		
E13	RB-ClosePoly	River B - Closed-Head Poly Drum Wash	Manufacturing and Materials Handling Equipment		1/1/2018	No		
E14	RB-OpenPoly	River B - Open-Head Poly Drum Wash	Manufacturing and Materials Handling Equipment		1/1/2018	No		
E15	RB-PolyPre	River B - Poly Drum Prewash	Manufacturing and Materials Handling Equipment		1/1/2013	No		
E16	RB-PolyShred	River B - Poly Drum Shred	Manufacturing and Materials Handling Equipment		1/1/2013	No		

**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.		
PT10	River A Roof	River A Roof Fan - Tote Wash	Round	36	24	30	65.0	40.0	90.0	9,000.0	9,000.0	9,000.0	Horizontal	
PT11	River A PreW	River A Tote Pre Wash	Round	14	28	30	65.0	40.0	90.0	1,800.0	1,800.0	1,800.0	Horizontal	
PT12	River A Shre	River A Shredder	Round	12	24	30	65.0	40.0	90.0	1,900.0	1,900.0	1,900.0	Horizontal	
PT13	River B #1	River B Wall #1	Round	36	20	150	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT14	River B #2	River B Wall #2	Round	36	20	130	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT15	River B #3	River B Wall #3	Round	36	20	110	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT16	River B #4	River B Wall #4	Round	36	20	90	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT17	River B #5	River B Wall #5	Round	36	20	70	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT18	River B #6	River B Wall #6	Round	36	20	50	65.0	40.0	90.0	10,500.0	10,500.0	10,500.0	Horizontal	PS 1
PT19	River B PreW	River B Pre-Wash	Round	14	28	40	65.0	40.0	90.0	1,800.0	1,800.0	1,800.0	Horizontal	
PT20	River B Sh1	River B Shredder Stack1	Round	12	27	20	65.0	40.0	90.0	500.0	500.0	500.0	Horizontal	
PT21	River B Sh2	River B Shredder Stack2	Round	12	27	20	65.0	40.0	90.0	500.0	500.0	500.0	Horizontal	
PT22	River B Open	River B Open-Head	Round	14	28	75	65.0	40.0	90.0	1,800.0	1,800.0	1,800.0	Horizontal	

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

U 10 Drum-Tote Drum and Tote Washing & Shredding

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.
OS1	RA-TotePre	River A - Tote Prewash	Normal - Steady State	E10		PT11	3-08-999-99	0.0	2,500.0	A	0.0	1,800.0	40.0	90.0
OS2	RA-ToteShred	River A - Tote Shredding	Normal - Steady State	E11		PT12	3-08-999-99	0.0	2,500.0	A	0.0	1,900.0	40.0	90.0
OS3	RA-ToteWash	River A - Tote Washing	Normal - Steady State	E12		PT10	3-08-999-99	0.0	2,500.0	A	0.0	9,000.0	40.0	90.0
OS4	RB-ClosePoly	River B - Closed-Head Poly Drum Wash	Normal - Steady State	E13		PT13 PT14 PT15 PT16 PT17 PT18	3-08-999-99	0.0	2,500.0	A	0.0	10,500.0	40.0	90.0
OS5	RB-OpenPoly	River B - Open-Head Poly Drum Wash	Normal - Steady State	E14		PT22	3-08-999-99	0.0	2,500.0	A	0.0	1,800.0	40.0	90.0
OS6	RB-PolyPre	River B - Poly Drum Prewash	Normal - Steady State	E15		PT19	3-08-999-99	0.0	2,500.0	A	0.0	1,800.0	40.0	90.0
OS7	RB-PolyShred	River B - Poly Drum Shredding	Normal - Steady State	E16		PT20 PT21	3-08-999-99	0.0	2,500.0	A	0.0	1,000.0	40.0	90.0

**New Jersey Department of Environmental Protection
Potential to Emit**

Subject Item: U10 Drum-Tote**Operating Scenario:** OS0 Summary**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			11.74000000	11.74000000	tons/yr	No

Subject Item: U10 Drum-Tote**Operating Scenario:** OS1**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

Subject Item: U10 Drum-Tote**Operating Scenario:** OS2**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			0.50000000	0.50000000	lb/hr	No

Subject Item: U10 Drum-Tote**Operating Scenario:** OS3**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

**New Jersey Department of Environmental Protection
Potential to Emit**

Subject Item: U10 Drum-Tote**Operating Scenario:** OS4**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

Subject Item: U10 Drum-Tote**Operating Scenario:** OS6**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			1.68000000	1.68000000	lb/hr	No

Subject Item: U10 Drum-Tote**Operating Scenario:** OS7**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
VOC (Total)			0.50000000	0.50000000	lb/hr	No

000000 E10 (Manufacturing and Materials Handling Equipment)
Print Date: 5/1/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Tote Prewash Station"/>
Capacity:	<input type="text" value="3.30E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="totes/day"/>
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 E11 (Manufacturing and Materials Handling Equipment)
Print Date: 5/1/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Tote Shredder"/>
Capacity:	<input type="text" value="3.30E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="totes/day"/>
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 E12 (Manufacturing and Materials Handling Equipment)
Print Date: 5/1/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Tote Washing"/>
Capacity:	<input type="text" value="2.20E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="Totes/day"/>
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 E13 (Manufacturing and Materials Handling Equipment)
Print Date: 5/1/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly Drum Washing"/>
Capacity:	<input type="text" value="6.00E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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 E14 (Manufacturing and Materials Handling Equipment)
Print Date: 5/1/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly Drum Washing"/>
Capacity:	<input type="text" value="6.00E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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 E15 (Manufacturing and Materials Handling Equipment)
Print Date: 5/1/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly drum prewash (before shred)"/>
Capacity:	<input type="text" value="5.60E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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 E16 (Manufacturing and Materials Handling Equipment)
Print Date: 5/1/2023

Make:	<input type="text"/>
Manufacturer:	<input type="text"/>
Model:	<input type="text"/>
Type of Manufacturing and Materials Handling Equipment:	<input type="text" value="Poly Drum Shredding"/>
Capacity:	<input type="text" value="5.60E+02"/>
Units:	<input type="text" value="other units"/>
Description (if other):	<input type="text" value="drums/day"/>
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:	

Yalartai, Bennett [DEP]

From: Joe Kwiatkowski <JKwiatkowski@trinityconsultants.com>
Sent: Wednesday, August 30, 2023 3:18 PM
To: Yalartai, Bennett [DEP]
Cc: Agrawal, Sunila [DEP]; Lehberger, Art [DEP]; Ed Bash; Mara Cohen Jackel
Subject: [EXTERNAL] RE: Request for Additional Info on Permit Application 52555/PCP23-0001 for PJ Kelly Drums' River Ave Camden Facility
Attachments: Attachment 3 - PFD.pdf; Equipment Inventory Details.pdf; Emission Unit Operation Scenario Details.pdf

Hi Bennett,

Please see below (and attached) for the responses to your requests for additional information for the PJKD (PI 52555 / PCP230001).

1. PDF copies of the revised edit details forms that correctly reflecting completion of all applicable fields for the following:
 - a. Each equipment
 - i. See attached file "Equipment Inventory Details.pdf"
 - b. Each OS
 - i. See attached file "Emission Unit Operating Scenario Details.pdf"
2. Detailed process description of the drum-tote washing and shredding operations (Note, pls follow the same format used for the Howell St Camden facility), including, but not limited to the following:
 - a. Operating hrs/day and days/week
 - i. 10 hours/day
 - ii. 5 days/week
 - b. Size of each washing station (gallons)
 - i. 700 gallons per wash line
 1. Tote line has 2 tanks
 2. Others 1 tank each
 - c. Wash water change-out frequency
 - i. Weekly
3. Detailed process flow diagram, preferably a simple block schematic showing all E and PTs with their NJIDs.
 - a. See attached file "Attachment 3 – PFD.pdf"
4. Annual data for the following:
 - a. Quantity of reconditioned poly drums
 - i. $600 \text{ drums/day} \times 250 \text{ days/year} = 150,000 \text{ drums/year}$
 - b. Quantity of shredded poly drums
 - i. $600 \text{ drums/day} \times 250 \text{ days/year} = 150,000 \text{ drums/year}$
 - c. Quantity of reconditioned poly totes
 - i. $220 \text{ totes/day} \times 250 \text{ days/year} = 55,000 \text{ totes/year}$
 - d. Quantity of shredded poly totes
 - i. $270 \text{ totes/day} \times 250 \text{ days/year} = 67,500 \text{ totes/year}$
 - e. Quantity of wastewater generated (gallons).
 - i. Reuse half of the water after onsite treatment
 - ii. 12,000 gallons/week (6,000 gallons/week reused)

iii. 244,000 gallons/year (122,000 gallons/year reused)

5. Revised electronic copy of the PTE calculations correctly reflecting PM emissions (PM10, PM2.5, & TSP) from the shredding operations, and any HAPs from the washing operations, if applicable.
 - a. The drums/totes are wet from pre-washing prior to going through the shredder. Particulate emissions are assumed to be negligible (as the drums are wet) as the shredding knives are cutting the drums/totes down to small fingernail-sized chips. There are no HAP emissions from these processes.

Thank you,
Joe

Joseph J. Kwiatkowski

Trinity Consultants

P 609.318.5500 D 609.336.9160 M 609.668.1779

From: Yalartai, Bennett [DEP] <Bennett.Yalartai@dep.nj.gov>

Sent: Tuesday, August 8, 2023 10:36 AM

To: Joe Kwiatkowski <JKwiatkowski@trinityconsultants.com>

Cc: Agrawal, Sunila [DEP] <Sunila.Agrawal@dep.nj.gov>; Lehberger, Art [DEP] <Art.Lehberger@dep.nj.gov>

Subject: Request for Additional Info on Permit Application 52555/PCP23-0001 for PJ Kelly Drums' River Ave Camden Facility

Hi Joe,

Just wanted to info that the permit for above referenced pending permit application is ready to be drafted, if you can readily address the following *RADIUS housekeeping issues*, and quickly submit your response with the requested info on/or before Tuesday, 15Aug2023:

1. PDF copies of the revised edit details forms that correctly reflecting completion of all applicable fields for the following:
 - a. Each equipment
 - b. Each OS
2. Detailed process description of the drum-tote washing and shredding operations (Note, pls follow the same format used for the Howell St Camden facility), including, but not limited to the following:
 - a. Operating hrs/day and days/week
 - b. Size of each washing station (gallons)
 - c. Wash water change-out frequency
3. Detailed process flow diagram, preferably a simple block schematic showing all E and PTs with their NJIDs.
4. Annual data for the following:
 - a. Quantity of reconditioned poly drums
 - b. Quantity of shredded poly drums
 - c. Quantity of reconditioned poly totes
 - d. Quantity of shredded poly totes
 - e. Quantity of wastewater generated (gallons).
5. Revised electronic copy of the PTE calculations correctly reflecting PM emissions (PM10, PM2.5, & TSP) from the shredding operations, and any HAPs from the washing operations, if applicable.

Thanks,

Bennett M. Yalartai
Environmental Engineer 3
Bureau of Stationary Sources
Tel: 609-633-8253
Email: bennett.yalartai@dep.nj.gov
<http://www.nj.gov/dep/aqes/index.html>

 Please consider the environment before printing this email

 Like us on Facebook



CAUTION: This email originated from outside of the Trinity Consultants organization. Do not click links or open attachments unless you recognize the sender's name, sender's email address and know the content is safe.

Patrick J. Kelly Drums
PI 52555
River Ave. Process Flow Diagram

