

STATEMENT OF BASIS for UNIMAC GRAPHICS
TITLE V OPERATING PERMIT RENEWAL
Program Interest (PI): 02842 / Permit Activity Number: BOP220001

I. FACILITY INFORMATION

Unimac Graphics is located at 350 Michelle's Place, Carlstadt, Bergen County, NJ 07072, and consists of printing operations. The facility is owned and operated by Unimac Graphics.

The facility is classified as a major facility based on its potential to emit 34.3 tons per year of volatile organic compounds.

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: 7 printing presses with one of the printing presses equipped with a thermal oxidizer. The thermal oxidizer has greater than 96.5% reduction efficiency for volatile organic compound emissions.

Table 1 - Operating Permit Revision History (located at the end of this document) provides a summary of all the changes that have been incorporated into the operating permit through seven-day notice changes, administrative amendments, minor modifications, or significant modifications since the approval of the initial operating permit or the most recent renewal thereof. Please refer to the attached explanation sheet for the structure and configuration of conditions of approval, included in the Facility Specific Requirements section of this permit.

A Health Risk Assessment was not conducted since there are no HAPs which exceeded any reporting thresholds in N.J.A.C. 7:27-17.9.

This is a Permit Renewal and does not include any changes.

IV. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

Surface Coating Equipment

For surface coating operation at emission unit U1, the facility monitors the coating usage (gal/yr) and VOC and HAP content (lb/gal) of all surface coating formulations as surrogates for the long-term (TPY) emission limits for VOC and HAPs. For each surface coating formulation, the facility monitors the coating usage (gal/hr), VOC content and HAP content as surrogates for the short-term (lb/hr) emission limits for VOC and HAPs.

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The facility monitors VOC emissions for heat set press at operating Scenario OS20 by stack test. The facility also monitors the natural gas usage by the thermal oxidizer.

3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
- Equipment size and capacity limitations,
 - Subject equipment being permitted at the maximum rated capacity,
 - There is no specific state or Federal standard that applies to this piece of equipment,
 - Not a pollutant of concern for this piece of equipment,
 - Agreements with EPA on the frequency of testing and monitoring for combustion sources.

V. APPLICABLE STATE AND FEDERAL RULES

The facility is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

The Greenhouse Gas (GHG) emissions from this facility are 1,365 TPY CO₂e and there is no GHG emissions increase. This renewal is not subject to PSD rules at 40 CFR 52.21.

VI. FACILITY'S COMPLIANCE STATUS

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

The facility has submitted a timely and complete application to renew their operating permit and an application shield is in effect.

This operating permit also includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Also, prior to the expiration of the five-year period, the facility will be required to apply for a renewal of this operating permit, at which time the Department will evaluate the facility and issue a public notice with its findings.

VII. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

Table 1 - Operating Permit Revision History

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP220002	Minor Modification	<p>Unimac Graphics submitted this Minor Modification Application to a new 10-color Sheetfed Printing Press and remove 4 printing presses from the Title V Operating Permit, as follows:</p> <ol style="list-style-type: none"> 1. Removal of existing 7-color sheetfed printing press E8, with related operating scenarios OS15 and OS16; 2. Removal of existing 6-color sheetfed printing press E13, with related operating scenarios OS25 and OS26; 3. Removal of existing 5-color sheetfed printing press E16, with related operating scenarios OS30 and OS31; and 4. Removal of existing 2-color non-heatset web printing press E17, with related operating scenarios OS32 and OS33. <p>Addition of New Press: The new 10-color Sheetfed Printing Press is configured for 5-colors, then a coater, then 5-colors and a second coater. It will be conventional and UV ink capable and runs at a maximum of 18,000 sheets/hour. The new Sheetfed Printing Press is included in existing emission unit U1 and will vent uncontrolled to existing emission point PT1. Potential emissions of all HAPs are below reporting thresholds established in N.J.A.C 7:27-17.</p>	2/4/25
BOP210001	Significant Modification	<p>This Significant Modification was to add a Sheetfed Printing Press at emission unit U1, existing emission point PT1 and Equipment ID E20, and Operating Scenario IDs (E20 - OS39-Printing & OS40-Cleaning). The throughput and potential emissions for this source were updated. No increase in facility-wide VOC emissions was proposed. Potential emissions of ethylbenzene were above reporting thresholds established in N.J.A.C 7:27-17. A health risk screening worksheet was completed long-term and short-term effects were determined to be negligible.</p> <p>In addition, the following contacts were updated: Air Permit Information Contact; Consultant, Fees/Billing Contact; and Responsible Official.</p>	7/11/22
BOP200001	Minor Modification	<p>This modification was to install a 2C Heidelberg Harris, non-heatset double web printing press, Equipment ID E23 at emission Unit U1, Operating Scenarios OS45 and OS46. The printing press will operate for a maximum of 6,240 hours per year. There will be an increase in VOC emissions equal to 1.99 tons per year. There will be no increase in emissions of any other pollutant. As a part of this modification the FC section of the compliance plan, and Section B of the Permit Text were updated.</p>	1/26/21

BOP190002	Minor Modification	<p>This modification was for</p> <ol style="list-style-type: none"> 1. Construction and operation of a 7C Heidelberg 64" x 48" sheetfed press with a dual UV/aqueous coating unit in late fall of 2019. 2. Removal of the existing 6C KBA 41" #3 sheetfed press (E20) and 6C KBA 64" sheetfed press (E12) 3. Decrease in facility wide VOC emissions from 52.3 tpy to 37.8 tpy and a decrease in HAPs emissions from 1.36 tpy to 1.18 tpy due to the above changes 	12/9/19
BOP190001	Minor Modification	<p>This modification was to modify the existing permit conditions related to the new thermal oxidizer due to the newly approved stack test results from 2016 as follows:</p> <ol style="list-style-type: none"> 1. Based on the most recent stack tests results, Applicable Requirement at Reference#4 under U1 OS20 has been updated as: THC concentration <=110 ppm as methane, and Submittal Requirement at Reference#4 under U1 OS20 has been removed as it has been satisfied. 2. Reference#5 under U1 OS20 that required the facility to submit a minor modification application has been removed as this requirement has been satisfied. 3. Reference#1 under U1 OS Summary that required the facility to conduct stack test to establish the THC concentration limit for the oxidizer has been removed as this condition has been satisfied. 	8/19/19

FACILITY NAME (FACILITY ID NUMBER)
BOP050001

Activity Number assigned
by the Department

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit Number
assigned by the Facility

Brief description of
emission unit

Emission Unit: U40 Sewage Sludge Incinerators
Operating Scenario: OS Summary

OR

OS2 Fluidized Bed Incinerator

OS Summary lists all rules and requirements that apply to an emission unit. An emission unit may contain one or more pieces of equipment and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules and requirements that apply to a scenario. An operating scenario represents various ways (or scenarios) a piece of equipment is permitted to operate.

Item
Number

Description of applicable
requirement

Monitoring method to
ensure compliance

Recordkeeping to show
facility's compliance

Actions and submittals
required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for
applicable requirement

Rule citation for
monitoring requirement

Rule citation for
recordkeeping requirement

Rule citation for submittal/
action requirement

Explanation Sheet for Facility Specific Requirements