

STATEMENT OF BASIS for SILGAN CONTAINERS CORPORATION

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): [17912](#) / Permit Activity Number: BOP200002

I. FACILITY INFORMATION

Silgan Containers Corporation is located at 135 National Road, Edison, NJ 08817 in Middlesex County and consists of a food product cans manufacturing plant. The facility is owned and operated by Silgan Containers Corporation.

The facility is classified as a major facility based on its potential to emit 54.5 tons per year of volatile organic compounds.

This permit allows individual hazardous air pollutant to be emitted at a rate to not exceed: 0.1 tons per year of formaldehyde, 8.22 tons per year of glycol ethers, and 1 ton per year of methyl isobutyl ketone.

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: pneumatic scrap conveying system, natural gas fired heaters, storage tanks, and an interior spray and wash coating system with emissions controlled by a regenerative thermal oxidizer.

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.

Health Risk Assessment was conducted as part of the review of this permit application and health risk was determined to be negligible consistent with NJDEP Technical Manual 1003.

This is a Permit Renewal and includes the following changes:

There are no proposed changes to air contaminants. The permit was updated with the most recently approved modification and stack testing language.

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

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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.
 - For the interior spray and washcoat processes in U3, the facility monitors the coating usage (gal/yr) and VOC content (lb/gal) of all coating formulations as surrogates for the long-term (TPY) emission limits for VOC.
 - For the bake ovens in U3, the facility monitors natural gas use as the surrogate for the long-term (TPY) emission limits for VOC, NOx, CO, TSP, PM-10 and PM-2.5.
 - For the bulk storage tanks in U8, the facility monitors vapor pressure and throughput of coating material as the surrogate for the long-term (TPY) emissions of VOC.
 - For the rapid air makeup units in U10 and U11, the facility monitors natural gas use as the surrogate for the long-term (TPY) emission limits for VOC, NOx, CO, TSP, PM-10 and PM-2.5.
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.

Based on the above criteria, there is no direct or surrogate monitoring for the following pieces of equipment: pneumatic conveyor system with cyclone separator.

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 6,000 TPY CO₂e and there is no GHG emissions increase. This renewal is not subject to PSD rules at 40 CFR 52.21

V. 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.

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VI. 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

New Jersey Department of Environmental Protection

Operating Permit Revision History

SILGAN CONTAINERS CORP CAN PLANT #522 PI 17912

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP230001	Minor Modification	<p>*Added the following pieces of equipment and operating scenarios:</p> <p>U3 OS27 - Surface Coating/Spray Machine (E125)</p> <p>U9 OS22 - Line Bodymaker (E247)</p> <p>*U3 OS Summary Ref. 5 updated monitoring and recordkeeping requirements to monthly calculations and to include capture efficiency of VOC emissions for the washcoat and spray lines.</p> <p>*U3 OS Summary Ref. 14 updated stack testing based on new language to ensure compliance is achieved.</p> <p>*U3 OS7/9/11 - Coating Usage updated from 79.2 to 13.0 gal/hr and 694,230 to 113,634 gallons per any consecutive 12 month period.</p> <p>*U3 OS13-27 - Coating Usage updated from 81.6 to 48.8 gal/hr and 715,035 to 427,365 gallons per any consecutive 12 month period.</p> <p>*THC CEMS monitoring limit has been included as 10 ppmvw (as propane) in accordance with the letter from Michael Klein of EMS dated 10/29/21.</p> <p>*Emission changes (U3):</p> <p>VOC lb/hr emissions from 16.4 lb/hr (8.42 lb/hr stack and 7.95 lb/hr fugitive) to 9.79 lb/hr (4.99 lb/hr stack and 4.8 lb/hr fugitive)</p> <p>VOC tpy emissions from 71.6 tpy (36.9 tpy stack and 34.8 tpy fugitive) to 43 tpy (22 tpy stack and 21 tpy fugitive)</p>	8/7/2024

BOP240001	Administrative Amendment	Change responsible official to Kevin Ulmer Change environmental engineer to Jessica Bango Change billing contact to Deepa Jhunhunwala Updated stack testing language in U3	4/2/2024
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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:
Operating Scenario:

U40 Sewage Sludge Incinerators
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