

STATEMENT OF BASIS for BAYSHORE RECYCLING CORP

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 19031 / Permit Activity Number: BOP190001

I. FACILITY INFORMATION

Bayshore Recycling Corp., is located at 75 Crows Mill Road, Keasbey, NJ 08832, Middlesex County and consists of the following operations: a Class B recycling facility accepting concrete, asphalt, brick, block, non-hazardous petroleum contaminated soils, street sweepings, water treatment plant residuals, carbon filtration media, clean wood, glass cullet and slag; a transfer station/materials recovery facility for bulky waste, construction & demolition debris and dry industrial waste; an area for consolidation of consumer electronics as a "large quantity handler". The facility is owned and operated by Bayshore Family of Companies.

The facility is classified as a major facility based on its potential to emit 34.89 tons per year of Nitrogen Oxides.

This permit allows individual hazardous air pollutants to be emitted at a rate not to exceed: 1144 pounds per year Benzene, 532 pounds per year Ethylbenzene, 968 pounds per year Toluene, 468 pounds per year Xylene, 82.2 pounds per year Mercury, 58.4 pounds per year Selenium, 600 pounds per year Acenaphthalene, 20 pounds per year Benzo(a)anthracene, 20 pounds per year Benzo(b)fluorene, 20 pounds per year Benzo(k)fluorene, 20 pounds per year Chrysene, 20 pounds per year Dibenz(a,h)anthracene, 600 pounds per year Fluoranthene, 600 pounds per year Fluorene, 20 pounds per year Indeno(1,2,3-c,d)pyrene, 600 pounds per year Phenanthrene, and 600 pounds per year Pyrene.

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: mobile screeners, electric crushers, electric screeners, conveyors, Low Temperature Thermal Desorption (LTTD) rotary kiln and a natural gas fired boiler; and control devices such as particulate filters, carbon injection and a 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.

A Facility-Wide 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 5-Year Operating Permit Renewal and does not include any changes. There are no proposed changes to air contaminants.

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:

STATEMENT OF BASIS for BAYSHORE RECYCLING CORP

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 19031 / Permit Activity Number: BOP190001

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.
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 facility is also subject to Federal regulations listed below.

NSPS Subpart A: General Provisions.

NSPS Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

MACT Subpart A: General Provisions.

MACT Subpart ZZZZ: Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The Greenhouse Gas (GHG) emissions from this facility are 20,370 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.

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

STATEMENT OF BASIS for BAYSHORE RECYCLING CORP

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 19031 / Permit Activity Number: BOP190001

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

BAYSHORE RECYCLING CORP PI 19031

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP240001	Minor Modification	<p>Pursuant to N.J.A.C. 7:27-22.23, Bayshore Recycling Corp. (Bayshore) is submitting this Title V minor modification application for its facility located in Keasbey, Middlesex County, New Jersey. The purpose of the application is to update the equipment inventory and make other corrections to reflect current facility operations.</p> <p>Several pieces of equipment in Emission Units U13 (Class B Facility Equipment), U16 (Portable Crusher), and U18 (Portable Screener) replaced in kind with new equipment of identical function, type, and capacities. Additionally, a new stationary electric crusher has been added to Emission Unit U13 as new Equipment E60 and Operating Scenario OS14. The new crusher is identical in capacity (80 tons/hr) to the existing stationary electric crusher (U13 OS4 E4). The new crusher will not increase the overall material processing on an annual basis. Therefore, no changes to the U13 OS Summary tons/yr emissions are proposed. Because the other replacement equipment are of the same type and capacities as the original equipment, no changes to permitted emission rates are involved.</p> <p>During recent maintenance of the facility's Low Temperature Thermal Desorption Unit, it was found that replacement of certain components of the plant would be necessary to continue operation. For Emission Unit U25 (LTDD Rotary Kiln), revisions to details related to the associated burner (E32) and thermal oxidizer (CD9) are requested to reflect replacement in kind with new burners of identical function and type, and slightly lower rated heat inputs. Revisions to the stack height, diameters, and volumetric flow rate for emission point (PT3) are requested to align with as-built conditions. Again, no changes in permitted emission rates are involved.</p> <p>Please see the application package for additional details.</p>	7/8/2024

BOP210001	Administrative Amendment	<p>Bayshore Recycling Corp is submitting this Administrative Amendment to the existing Operating Permit, BOP160001 in order to correct a typographical error and change a company stack designation in accordance with N.J.A.C 7:27-22.20(b)2 and 4.</p> <p>An emission point listed on the Emission Point Inventory page was accidentally deleted during a previously submitted Significant Modification.</p> <p>No other permit details are being changed, facility PTE remains unchanged.</p> <p>No new significant or insignificant pieces of equipment are being added or removed under this proposed action.</p> <p>In order to correct this error, PT2 & PT3 are being renamed to be consistent with the older BOP130001 Emission Point Inventory. All other references to PT2 & PT3 within BOP160001 are still correctly tied to the LTTD system. The current PT2 & PT3 under BOP160001, are both already covered under the existing PT1 emission point which correctly includes the Class B facility equipment.</p>	5/25/2021
BOP160001	Significant Modification	<p>The reason for application is to modify the followings in the operating permit:</p> <ol style="list-style-type: none"> 1. Addition of the following equipment to the permit: a portable conveyor, two portable rock crushers, four portable screeners, two balers, and a sorting line. 2. The following operational changes to the existing approved equipment: Tracking the engine operating hours in the monitoring requirement instead of monitoring the amount of fuel used in each engine, so it enables the computation of actual emissions for the annual emissions statement. This monitoring requirement is included in U13, OS Summary, Ref # 2. 3. Modify the operating permit to show the six identical roof fans rather than the currently approved eight fans with particulate control in the MRF/MDS building. 	10/11/2018
BOP130001	Initial	<p>Initial Title V Operating Permit to combine four existing preconstruction PCP permits: ID18236/PCP080001 Bayshore Recycling Corp, ID18437/PCP100001 Bayshore Soil Treatment, ID 18532/PCP090001 and PCP080003 Montecalvo-Transfer station, and ID 18667/BOP080003 Innovative Recycling.</p>	7/14/2015

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