

# STATEMENT OF BASIS for FRAZIER INDUSTRIAL CO

## TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 26188 / Permit Activity Number: BOP240001

### I. FACILITY INFORMATION

Frazier Industrial Co is located at 91 Fairview Ave, Long Valley, NJ, 07853, Morris County and consists of welding operations performing Gas Metal Arc cutting and welding of metal frames, in addition to paint dip tanks. The facility is owned and operated by Jeff Jarvis.

The facility is classified as a major facility based on its potential to emit 31.2 tons per year of VOC, 1.35 tons per year of NOx, 0.31 tons per year of CO, 0.1 tons per year of TSP/PM-10/PM2.5

This permit does not contain any hazardous air pollutants.

### 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 (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), 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 paint dip tanks; an emergency generator; miscellaneous welding equipment; and manufacturing equipment.

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, significant modifications, or General Operating Permits (GOP) 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.

The following changes were made to the permit during this renewal process:

1. Deleted Emission Unit U5 Emergency Generator, which is no longer on-site and is replaced with a new Emergency Generator permitted under a General Operating Permit;
2. Deleted HAPs, Toluene, and Xylene emissions from Emission Unit U1. Current paint formulations and solvents used in the facility no longer contain HAPs that are above the reporting thresholds.
3. Reduced the weld wire usage, TSP, PM-10, and PM-25 emissions for Emission Unit U3 Gas Metal Arc Cutting and Welding of Metal Frames.

The changes made during this permit activity result in a decrease of allowable annual emissions of TSP, PM-10, and PM-2.5 by 0.25 tons, Toluene by 0.81 tons, Xylene by 9.98 tons.

### 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

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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.

For the diesel emergency generator in Emission Unit U5, the facility monitors hours of operation for both the short term (lb/hr) and 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.

### 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 EE:	Standards of Performance for Surface Coating of Metal Furniture
NSPS Subpart IIII:	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
MACT Subpart T:	National Emission Standards for Halogenated Solvent Cleaning
MACT Subpart ZZZZ:	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The Greenhouse Gas (GHG) emissions from this facility are 49.25 TPY CO<sub>2</sub>e 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 forms the basis for the conditions in the operating permit.

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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.

New Jersey Department of Environmental Protection

Operating Permit Revision History

FRAZIER INDUSTRIAL CO    PI 26188

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP230001	Administrative Amendment	The following changes were made to the operating permit during this amendment process:  Updated the Air Permit Contact, Fees/Billing Contact, Operator, and Owner (Curent Primary) contacts (Jeff Jarvis).	4/26/2023
BOP200002	General Operating Permit	1.5 MMBTU/hr (HHV), Boiler Natural Gas Only	11/09/2023

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