

STATEMENT OF BASIS for 9000 RIVER ROAD

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 51609 / Permit Activity Number: BOP210001

I. FACILITY INFORMATION

9000 River Road is located at 9000 River Road, Pennsauken, Camden County, NJ 08110 and consists of equipment to manufacture aluminum extruded products. The facility is owned and operated by VV9000 LLC.

The potential to emit in this Title V Operating Permit Renewal application is below the Major Facility Threshold Levels in the definition of "Major Facility" at N.J.A.C. 7:27-22.1. However, all applicable source operations still need to be included in a Title V Operating Permit at this time.

This permit allows individual hazardous air pollutants to be emitted at a rate not to exceed: 0.048 pounds per year of arsenic, 0.26 pounds per year of cadmium, 0.02 pounds per year of cobalt, 0.0038 pounds per year of Dimethylbenz(a)anthracene (7,12-), 18 pounds per year of formaldehyde, 6320 pounds per year of hydrogen chloride, 4300 pounds per year of hydrogen fluoride and 0.0023 pounds per year of dioxins/furans (Total Equivalence).

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: ten heaters, three billet furnaces, four aging ovens, an aluminum holding furnace, an aging furnace, two boilers, four homogenizing ovens, four melting furnaces equipped with baghouses with no less than 99% reduction efficiency for particulate emissions, two bandsaws equipped with baghouses with no less than 99% reduction efficiency for particulate emissions, an abrasive blaster equipped with a cartridge filter with no less than 99% reduction efficiency for particulate emissions, two sulfuric acid tanks equipped with a scrubber with no less than 95% reduction efficiency for particulate and sulfuric acid emissions, an etch plating line equipped with a scrubber with no less than 95% reduction efficiency for particulate emissions, and an aluminum anodizing line equipped with a scrubber with no less than 95% reduction efficiency for particulate 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 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 Permit Renewal and includes the following changes:

-Subject Item GR1 was added, which establishes a facility-wide natural gas usage limit for all combustion significant source operations in U1, U2, U11, U15, U16, U23, U24, U25 and U26

-HAP emission limits were added to GR1, U1, U2, U11, U15, U16, U23, U24, U25 and U26 for all HAPS due to natural gas combustion which exceed emissions reporting thresholds contained in N.J.A.C. 7:27-

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-Annual potential hydrogen chloride emissions were reduced from 16.12 tpy to 3.16 tpy for U24 Group 1 Furnaces. For U24 OS7, OS9, OS11 and OS13, the hydrogen chloride emission limits were reduced from 3.68 lb/hr to 0.74 lb/hr and from 0.40 lb per ton of feed/charge to 0.08 lb per ton of feed/charge based on the most recent stack test results in TST150001.

-Annual potential hydrogen fluoride emissions were reduced from 16.12 tpy to 2.15 tpy for U24 Group 1 Furnaces. For U24 OS7, OS9, OS11 and OS13, the hydrogen fluoride emission limits were reduced from 3.68 lb/hr to 0.51 lb/hr and from 0.40 lb per ton of feed/charge to 0.055 lb per ton of feed/charge based on the most recent stack test results in TST150001.

-Fuel oil operating scenarios were removed from U23 Group 2 Furnace and U24 Group 1 Furnaces.

-The following pieces of equipment were removed:

- E1 - 4.4 MMBTU/hr Billet Furnace
- E54 - 7.2 MMBTU/hr Billet Furnace
- E300 - 9 MMBTU/hr Billet Furnace
- E301 - 7.531 MMBTU/hr Billet Furnace
- E3 - 4.62 MMBTU/hr Make-up air heater
- E10 - 3.78 MMBTU/hr Make-up air heater
- E51 - 5.5 MMBTU/hr Aging Oven
- E56 - 2.5 MMBTU/hr Aging Oven
- E63 - 4.5 MMBTU/hr Aging Oven
- E58 - 2.2 MMBTU/hr Space Heater
- E64 - 1.2 MMBTU/hr Space Heater
- E58 - 2.2 MMBTU/hr Space Heater
- E216 - 1.675 MMBTU/hr Space Heater
- E217 - 2.24 MMBTU/hr Space Heater
- E218 - 2.24 MMBTU/hr Space Heater
- E9 - 3 MMBTU/hr Drying Oven
- E17 - 1 MMBTU/hr Heat Cleaning Oven
- E46 - 6.275 MMBTU/hr Boiler
- E47 - 6.275 MMBTU/hr Boiler
- E74 - 3.85 MMBTU/hr Rapid Heating System
- E239-E244 Welders

-CD300 Baghouse, controlling E303 and E304, was added to the permit. It was previously accidentally removed.

-An initial performance test requirement was added for U24 because the U24 furnaces are currently out of operation and the last performance test was more than 5 years ago.

-For federal emission limits from 40 CFR 63 Subpart RRR in U24 OS7, OS9, OS11 and OS13, language was added, specifying that compliance with these limits shall be measured prior to the baghouse inlet because the permittee must demonstrate that the baghouses are not needed to meet the emission limits to not be subject to bag leak detection requirements.

The changes made during this permitting action result in allowable annual emissions changes as follows: VOC emissions decrease from 4.59 to 0.66 tons per year (TPY), NOx emissions decrease from 122 to 12 TPY, CO emissions decrease from 101.8 to 10.1 TPY, SO2 emissions decrease from 2.24 TPY to below reporting threshold, TSP, PM-10 and PM-2.5 emissions decrease from 24.8 to 18.6 TPY and HAP emissions decrease from 32.24 to 5.32 TPY.

IV. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

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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.

For U1 Billet Furnaces, U2 Heater, U11 Aging Ovens, U15 Space Heaters, U16 Homogenizing Ovens, U23 Holding Furnace, U25 Aging Oven and U29 Heating Systems, the facility monitors fuel use as the surrogate for the long-term (TPY) emission limits for VOC, NOx, CO, TSP, PM-10, PM-2.5 and HAPs.

For U5 Abrasive Blasting, U7 Etch Plating and U13 Sulfuric Acid Tanks, the facility monitors raw materials and total material transferred (lb/hr) as surrogates for the short-term (lb/hr) emission limit for TSP.

For U24 Melting Furnaces, the facility monitors fuel use as the surrogate for the long-term (TPY) emission limits for VOC, NOx, CO, and combustion HAPs. The facility monitors the total material transferred (TPY) as the surrogate for the long-term (TPY) emission limits for TSP, PM-10, PM-2.5 and process HAPs. Raw materials and total material transferred (lb/hr) are monitored as surrogates for the short-term (lb/hr) emission limits for TSP, PM-10, PM-2.5 and process HAPs.

For U26 boilers, the facility monitors fuel use as the surrogate for the long-term (TPY) emission limits for VOC, NOx, CO, TSP, PM-10, PM-2.5 and HAPs. Surrogate monitoring for the short-term (lb/hr) emission limits are combustion process adjustment for NOx and CO.

For U45 Bandsaws and U90 Aluminum Anodizing, the facility monitors the total material transferred (TPY) as the surrogate for the long-term (TPY) emission limits for TSP, PM-10, PM-2.5. The facility monitors raw materials and total material transferred (lb/hr) as surrogates for the short-term (lb/hr) emission limits for 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.

MACT Subpart A: General Provisions

MACT Subpart RRR: Secondary Aluminum Production

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MACT Subpart ZZZZ: Stationary Reciprocating Internal Combustion Engines

MACT Subpart DDDDD: Industrial, Commercial, and Institutional Boilers and Process Heaters

The Greenhouse Gas (GHG) emissions from this facility are 1,545 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's operating permit has expired without an application shield.

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
BOP210002	Administrative Amendment	Administrative Amendment to transfer ownership of facility from Aluminum Shapes LLC to VV9000 LLC. The facility name was changed to 9000 River Road.	1/6/2022

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