



State of New Jersey

Department of Environmental Protection

Air Quality, Energy and Sustainability

Division of Air Quality

Bureau of Stationary Sources

401 E. State Street, 2nd Floor, P.O. Box 420, Mail Code 401-02

Trenton, NJ 08625-0420

PHILIP D. MURPHY

Governor

SHAWN M. LATOURETTE

COMMISSIONER

SHEILA Y. OLIVER

Lt. Governor

Air Pollution Control Operating Permit Significant Modification

Permit Activity Number: BOP200001

Program Interest Number: 46046

Mailing Address	Plant Location
Joe Derr Plant Manager AMERICAN BILTRITE INC 105 WHITTENDALE DR Moorestown, NJ 08057	AMERICAN BILTRITE INC 105 Whittendale Dr Moorestown Burlington County

Initial Operating Permit Approval Date:

September 21, 2004

Operating Permit Approval Date:

PROPOSED

Operating Permit Expiration Date:

September 20, 2019 (Operating under application shield)

AUTHORITY AND APPLICABILITY

The New Jersey Department of Environmental Protection (Department) approves and issues this Air Pollution Control Operating Permit under the authority of Chapter 106, P.L. 1967 (N.J.S.A. 26:2C-9.2). This permit is issued in accordance with the air pollution control permit provisions promulgated at Title V of the Federal Clean Air Act, 40 CFR 70, Air Pollution Control Act codified at N.J.S.A. 26:2C and New Jersey State regulations promulgated at N.J.A.C. 7:27-22.

The Department approves this operating permit based on the evaluation of the certified information provided in the permit application that all equipment and air pollution control devices regulated in this permit comply with all applicable State and Federal regulations. The facility shall be operated in accordance with the conditions of this permit. This operating permit supersedes any previous Air Pollution Control Operating Permits issued to this facility by the Department including any general operating permits, renewals, significant modifications, minor modifications, seven-day notice changes or administrative amendments to the permit.

Changes made through this permit activity are provided in the Reason for Application.

PERMIT SHIELD

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17.

COMPLIANCE SCHEDULES

This operating permit does not include compliance schedules as part of the approved compliance plan.

COMPLIANCE CERTIFICATIONS AND DEVIATION REPORTS

The permittee shall submit to the Department and to United States Environmental Protection Agency (US EPA) periodic compliance certifications, in accordance with N.J.A.C. 7:27-22.19. **The annual compliance certification** is due to the Department and EPA within 60 days after the end of each calendar year during which this permit was in effect. **Semi-annual deviation reports** relating to compliance testing and monitoring are due to the Department within 30 days after the end of the semi-annual period. The schedule and additional details for these submittals are available in Subject Item - FC, of the Facility Specific Requirements of this permit.

ACCESSING PERMITS

The facility's current approved operating permit and any previously issued permits (e.g. superseded, expired, or terminated) are available for download in PDF format at: <http://www.nj.gov/dep/aqpp>. After accessing the website, click on "Approved Operating Permits" listed under "Reports" and then type in the Program Interest (PI) Number as instructed on the screen. If needed, the RADIUS file for your permit, containing Facility Specific Requirements (Compliance Plan), Inventories and Compliance Schedules can be obtained by contacting the Helpline number given below. RADIUS software, instructions, and help are available at the Department's website at <http://www.nj.gov/dep/aqpp>.

HELPLINE

The Operating Permit Helpline is available for any questions at (609) 633-8248 from 9:00 AM to 4:00 PM Monday to Friday.

RENEWING YOUR OPERATING PERMIT AND APPLICATION SHIELD

The permittee is responsible for submitting a timely and administratively complete operating permit renewal application pursuant to N.J.A.C. 7:27-22.30. Only applications which are timely and administratively complete are eligible for an application shield. The details on the contents of the renewal application, submittal schedule, and application shield are available in Section B - General Provisions and Authorities of this permit.

COMPLIANCE ASSURANCE MONITORING

Facilities that are subject to Compliance Assurance Monitoring (CAM), pursuant to 40 CFR 64, shall develop a CAM Plan for modified equipment as well as existing sources. The rule and guidance on how to prepare a CAM Plan can be found at EPA's website: <https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring>. In addition, CAM Plans must be included as part of the permit renewal application. Facilities that do not submit a CAM Plan may have their permit applications denied, pursuant to N.J.A.C. 7:27-22.3.

ADMINISTRATIVE HEARING REQUEST

If, in your judgment, the Department is imposing any unreasonable condition of approval, you may contest the Department's decision and request an adjudicatory hearing pursuant to N.J.S.A. 52:14B-1 et seq. and N.J.A.C. 7:27-22.32(a). All requests for an adjudicatory hearing must be received in writing by the Department within 20 calendar days of the date you receive this letter. The request must contain the information specified in N.J.A.C. 7:27-1.32 and the information on the NJ04 - Administrative Hearing Request Checklist and Tracking Form available at <https://www.state.nj.us/dep/aqpp/applying.html>.

If you have any questions regarding this permit approval, please call Alexander Sung at (609) 633-8239.

Approved by:

Art Lehberger

Enclosure

CC: Suilin Chan, United States Environmental Protection Agency, Region 2

Facility Name: AMERICAN BILTRITE INC
Program Interest Number: 46046
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Section A

Facility Name: AMERICAN BILTRITE INC
Program Interest Number: 46046
Permit Activity Number: BOP200001

POLLUTANT EMISSIONS SUMMARY

Table 1: Total emissions from all Significant Source Operations¹ at the facility.

Facility's Potential Emissions from all Significant Source Operations (tons per year)										
Source Categories	VOC (total)	NO _x	CO	SO ₂	TSP (total)	PM ₁₀ (total)	PM _{2.5} (total)	Pb	HAPs* (total)	CO ₂ e ²
Emission Units Summary	142.1	18.0	15.1	N/A	0.89	0.89	0.89	N/A	36.5	
Batch Process Summary	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Group Summary	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Total Emissions	142.1	18.0	15.1	N/A	0.89	0.89	0.89	N/A	36.5	37,665

Table 2: Estimate of total emissions from all Insignificant Source Operations¹ and total emissions from Non-Source Fugitives at the facility.

Emissions from all Insignificant Source Operations and Non-Source Fugitive Emissions (tons per year)									
Source Categories	VOC (total)	NO _x	CO	SO ₂	TSP (total)	PM ₁₀ (total)	PM _{2.5} (total)	Pb	HAPs (total)
Insignificant Source Operations	0.013	0.24	0.048	0.001	0.007	0.007	0.007	N/A	N/A
Non-Source Fugitive Emissions ³	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

VOC: Volatile Organic Compounds

NO_x: Nitrogen Oxides

CO: Carbon Monoxide

SO₂: Sulfur Dioxide

N/A: Indicates the pollutant is not emitted or is emitted below the reporting threshold specified in N.J.A.C. 7:27-22, Appendix, Table A and N.J.A.C. 7:27-17.9(a).

TSP: Total Suspended Particulates

Other: Any other air contaminant

regulated under the Federal CAA

PM₁₀: Particulates under 10 microns

PM_{2.5}: Particulates under 2.5 microns

Pb: Lead

HAPs: Hazardous Air Pollutants

CO₂e: Carbon Dioxide equivalent

*Emissions of individual HAPs are provided in Table 3 on the next page.

Emissions of "Other" air contaminants are provided in Table 4 on the next page.

¹ Significant Source Operations and Insignificant Source Operations are defined at N.J.A.C. 7:27-22.1.

² Total CO₂e emissions for the facility.

³ Non-Source Fugitive Emissions are included if the facility falls into one or more categories listed at N.J.A.C. 7:27-22.2(a)2.

Section A

Facility Name: AMERICAN BILTRITE INC
Program Interest Number: 46046
Permit Activity Number: BOP200001

POLLUTANT EMISSIONS SUMMARY

Table 3: Summary of Hazardous Air Pollutants (HAP) Emissions from Significant Source Operations ⁴:

HAP	TPY
Toluene	36.5

Table 4: Summary of “Other” air contaminants emissions from Significant Source Operations:

Other Air Contaminant	TPY
Ammonia	37.4

⁴ Do not sum the values below for the purpose of establishing a total HAP potential to emit. See previous page for the allowable total HAP emissions.

Section B

Facility Name: AMERICAN BILTRITE INC

Program Interest Number: 46046

Permit Activity Number: BOP200001

GENERAL PROVISIONS AND AUTHORITIES

1. No permittee shall allow any air contaminant, including an air contaminant detectable by the sense of smell, to be present in the outdoor atmosphere in a quantity and duration which is, or tends to be, injurious to human health or welfare, animal or plant life or property, or which would unreasonably interfere with the enjoyment of life or property. This shall not include an air contaminant that occurs only in areas over which the permittee has exclusive use or occupancy. Requirements relative only to nuisance situations, including odors, are not considered federally enforceable. [N.J.A.C. 7:27-22.16(g)8]
2. Any deviation from operating permit requirements which results in a release of air contaminants shall be reported to the Department as follows:
 - a. If the air contaminants are released in a quantity or concentration which poses a potential threat to public health, welfare or the environment or which might reasonably result in citizen complaints, the permittee shall report the release to the Department:
 - i. Immediately on the Department hotline at 1-(877) 927-6337, pursuant to N.J.S.A. 26:2C-19(e); and
 - ii. As part of the compliance certification required in N.J.A.C. 7:27-22.19(f). However, if the deviation is identified through source emissions testing, it shall be reported through the source emissions testing and monitoring procedures at N.J.A.C. 7:27-22.18(e)3; or
 - b. If the air contaminants are released in a quantity or concentration which poses no potential threat to public health, welfare or the environment and which will not likely result in citizen complaints, the permittee shall report the release to the Department as part of the compliance certification required in N.J.A.C. 7:27-22.19(f), except for deviations identified by source emissions testing reports, which shall be reported through the procedures at N.J.A.C. 7:27-22.18(e)3; or
 - c. If the air contaminants are released in a quantity or concentration which poses no potential threat to public health, welfare or the environment and which will not likely result in citizen complaints, and the permittee intends to assert the affirmative defense afforded by N.J.A.C. 7:27-22.16(l), the violation shall be reported by 5:00 PM of the second full calendar day following the occurrence, or of becoming aware of the occurrence, consistent with N.J.A.C. 7:27-22.16(l). [N.J.A.C. 7:27-22.19(g)1]
3. The permittee shall comply with all conditions of the operating permit including the approved compliance plan. Any non-compliance with a permit condition constitutes a violation of the New Jersey Air Pollution Control Act N.J.S.A. 26:2C-1 et seq., or the CAA, 42 U.S.C. §7401 et seq., or both, and is grounds for enforcement action; for termination, revocation and reissuance, or for modification of the operating permit; or for denial of an application for a renewal of the operating permit. [N.J.A.C. 7:27-22.16(g)1]
4. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of its operating permit. [N.J.A.C. 7:27-22.16(g)2]
5. This operating permit may be modified, terminated, or revoked for cause by the EPA pursuant to 40 CFR 70.7(g) and revoked or reopened and modified for cause by the Department pursuant to N.J.A.C. 7:27-22.25. [N.J.A.C. 7:27-22.16(g)3]

6. The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this operating permit; or to determine compliance with the operating permit. [N.J.A.C. 7:27-22.16(g)4]
7. The filing of an application for a modification of an operating permit, or of a notice of planned changes or anticipated non-compliance, does not stay any operating permit condition. [N.J.A.C. 7:27-22.16(g)5]
8. The operating permit does not convey any property rights of any sort, or any exclusive privilege. [N.J.A.C. 7:27-22.16(g)6]
9. Upon request, the permittee shall furnish to the Department copies of records required by the operating permit to be kept. [N.J.A.C. 7:27-22.16(g)7]
10.
 - a. For emergencies (as defined at 40 CFR 70.6(g)(1)) that result in non-compliance with any promulgated federal technology-based standard such as NSPS, NESHAPS, or MACT, a federal affirmative defense is available, pursuant to 40 CFR 70. To assert a federal affirmative defense, the permittee must use the procedures set forth in 40 CFR 70. The affirmative defense provisions described below may not be applied to any situation that caused the Facility to exceed any federally delegated regulation, including but not limited to NSPS, NESHAP, or MACT.
 - b. For situations other than those covered above, an affirmative defense is available for a violation of a provision or condition of the operating permit only if:
 - i. The violation occurred as a result of an equipment malfunction, an equipment startup or shutdown, or during the performance of necessary equipment maintenance; and
 - ii. The affirmative defense is asserted and established as required by N.J.S.A. 26:2C-19.1 through 19.5 and any implementing rules. [N.J.A.C. 7:27-22.16(l)]
11. In the event of a challenge to any part of this operating permit, all other parts of the permit shall continue to be valid. [N.J.A.C. 7:27-22.16(f)]
12. Each owner and each operator of any facility, source operation, or activity to which this permit applies is responsible for ensuring compliance with all requirements of N.J.A.C. 7:27-22. If the owner and operator are separate persons, or if there is more than one owner or operator, each owner and each operator is jointly and severally liable for any fees due under N.J.A.C. 7:27-22, and for any penalties for violation of N.J.A.C. 7:27-22. [N.J.A.C. 7:27-22.3]
13. The permittee shall ensure that no air contaminant is emitted from any significant source operation at a rate, calculated as the potential to emit, that exceeds the applicable threshold for reporting emissions set forth in the Appendix to N.J.A.C. 7:27-22 or 7:27-17.9(a), unless emission of the air contaminant is authorized by this operating permit. [N.J.A.C. 7:27-22.3(c)]
14. Consistent with the provisions of N.J.A.C. 7:27-22.3(e), the permittee shall ensure that all requirements of this operating permit are met. In the event that there are multiple emission limitations, monitoring, recordkeeping, and/or reporting requirements for a given source operation, the facility must comply with all requirements, including the most stringent.
15. Consistent with the provisions of N.J.A.C. 7:27-22.3(s), Except as otherwise provided in this subchapter, the submittal of any information or application by a permittee including, but not limited to, an application or notice for any change to the operating permit, including any administrative amendment, any minor or significant modification, renewal, a notice of a seven-day notice change, a notice of past or anticipated noncompliance, does not stay any operating permit condition, nor relieve a permittee from the obligation to obtain other necessary permits and to comply with all applicable Federal, State, and local requirements.

16. Applicable requirements derived from an existing or terminated consent decree with EPA will not be changed without advance consultation by the Department with EPA. N.J.A.C. 7:27-22.3(uu).
17. Unless specifically exempted from permitting, temporary mobile equipment for short-term activities may be periodically used at major facilities, on site for up to 90 days if the requirements listed below, (a) through (h) are satisfied.
 - a. The permittee will ensure that the temporary mobile equipment will not be installed permanently or used permanently on site.
 - b. The permittee will ensure that the temporary mobile equipment will not circumvent any State or Federal rules and regulations, even for a short period of time, and the subject equipment will comply with all applicable performance standards.
 - c. The permittee cannot use temporary mobile equipment unless the owner or operator of the subject equipment has obtained and maintains an approved Air Pollution Control Permit, issued pursuant to N.J.A.C. 7:27-8 or 22, prior to bringing the temporary mobile equipment to operate at the major facility.
 - d. The permittee is responsible for ensuring the temporary mobile equipment's compliance with the terms and conditions specified in its approved Air Pollution Control Permit when the temporary mobile equipment operates on the property of the permittee.
 - e. The permittee will ensure that temporary mobile equipment utilized for short-term activities will not operate on site for more than a total of 90 days during any calendar year.
 - f. The permittee will keep on site a list of temporary mobile equipment being used at the facility with the start date, end date, and record of the emissions from all such equipment (amount and type of each air contaminant) no later than 30 days after the temporary mobile equipment completed its job in accordance with N.J.A.C. 7:27-22.19(i)3.
 - g. Emissions from the temporary mobile equipment must be included in the emission netting analysis required of the permittee by N.J.A.C. 7:27-18.7. This information is maintained on site by the permittee and provided to the Department upon request in accordance with existing applicable requirements in the FC Section of its Title V permit.
 - h. Where short-term activities (employing temporary mobile equipment) will reoccur on at least an annual basis, the permittee is required to include such activities (and the associated equipment) within one year of the first use, in its Title V permit through the appropriate modification procedures.
18. Consistent with the provisions of N.J.A.C. 7:27-22.9(c), the permittee shall use monitoring of operating parameters, where required by the compliance plan, as a surrogate for direct emissions testing or monitoring, to demonstrate compliance with applicable requirements.
19. The permittee is responsible for submitting timely and administratively complete operating permit applications:

Administrative Amendments [N.J.A.C. 7:27-22.20(c)];
Seven-Day Notice changes [N.J.A.C. 7:27-22.22(e)];
Minor Modifications [N.J.A.C. 7:27-22.23(e)];
Significant Modifications [N.J.A.C. 7:27-22.24(e)]; and
Renewals [N.J.A.C. 7:27-22.30(b)].
20. The operating permit renewal application consists of a RADIUS application and the application attachment available at the Department's website <http://www.nj.gov/dep/aqpp/applying.html> (Attachment to the RADIUS Operating Permit Renewal Application). Both the RADIUS application and the Application Attachment, along with any other supporting documents must be submitted using the Department's Portal

at: <http://njdeponline.com/>. The application is considered timely if it is received at least 12 months before the expiration date of the operating permit. To be deemed administratively complete, the renewal application shall include all information required by the application form for the renewal and the information required pursuant to N.J.A.C. 7:27-22.30(d). However, consistent with N.J.A.C. 7:27-22.30(c), the permittee is encouraged to submit the renewal application at least 15 months prior to expiration of the operating permit, so that any deficiencies can be identified and addressed to ensure that the application is administratively complete by the renewal deadline. Only renewal applications which are timely and administratively complete are eligible for an application shield.

21. For all source emissions testing performed at the facility, the phrase “worst case conditions without creating an unsafe condition” used in the enclosed compliance plan is consistent with EPA’s National Stack Testing Guidance, dated April 27, 2009, where all source emission testing performed at the facility shall be under the representative (normal) conditions that:
 - i. Represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and
 - ii. Are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition.
22. Consistent with EPA’s National Stack Testing Guidance and Technical Manual 1004, a facility may not stop an ongoing stack test because it would have failed the test unless the facility also ceases operation of the equipment in question to correct the issue. Stopping an ongoing stack test in these instances will be considered credible evidence of emissions non-compliance.
23. Each permittee shall maintain records of all source emissions testing or monitoring performed at the facility and required by the operating permit in accordance with N.J.A.C. 7:27-22.19. Records shall be maintained, for at least five years from the date of each sample, measurement, or report. Each permittee shall maintain all other records required by this operating permit for a period of five years from the date each record is made. At a minimum, source emission testing or monitoring records shall contain the information specified at N.J.A.C. 7:27-22.19(b). [N.J.A.C. 7:27-22.19(a) and N.J.A.C. 7:27-22.19(b)]
24. A Permittee may seek the approval of the Department for a delay in testing required pursuant to this permit by submitting a written request to the appropriate Regional Enforcement Office in accordance with N.J.A.C. 7:27-22.18(k). A Permittee may also seek advanced approval for a longer period for submittal of a source emissions test report required by the permit by submitting a request to the Department’s Regional Enforcement Office in accordance with N.J.A.C. 7:27-22.19. [N.J.A.C. 7:27-22.18(k) and N.J.A.C. 7:27-22.19]

Section C

Facility Name: AMERICAN BILTRITE INC

Program Interest Number: 46046

Permit Activity Number: BOP200001

STATE-ONLY APPLICABLE REQUIREMENTS

N.J.A.C. 7:27-22.16(b)5 requires the Department to specifically designate as not being federally enforceable any permit conditions based only on applicable State requirements. The applicable State requirements to which this provision applies are listed in the table titled "State-Only Applicable Requirements."

STATE-ONLY APPLICABLE REQUIREMENTS

The following applicable requirements are not federally enforceable:

<u>SECTION</u>	<u>SUBJECT ITEM</u>	<u>ITEM #</u>	<u>REF. #</u>
B	---	1	---
B	---	10b	---
D	FC	---	3
D	FC	---	9

Section D

Facility Name: AMERICAN BILTRITE INC
Program Interest Number: 46046
Permit Activity Number: BOP200001

FACILITY SPECIFIC REQUIREMENTS AND INVENTORIES

FACILITY SPECIFIC REQUIREMENTS PAGE INDEX

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Facility (FC):

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Insignificant Sources (IS):

IS NJID	IS Description	
IS1	44 Direct-Fired Space Heaters, less than 1 MM BTU/hr, burning natural gas	7

Groups (GR):

GR NJID	GR Designation	GR Description	
GR1	RR Coating	NSPS Subpart RR Requirement for U3-U5 & U8	8
GR2	NSPS	NSPS Subparts A & RR Requirements for U5 & U8	9
GR3	MACT	MACT Subparts A & JJJJ Requirements for U5 & U8	19

Emission Units (U):

U NJID	U Designation	U Description	
U1	C001	Line 1 Water Based Adhesive Surface Coater	27
U2	C002	Line 2 Water Based Adhesive Surface Coater	33
U3	C003	Line 3 Water Based Adhesive Surface Coater	39
U4	C004	Line 4 Water Based Adhesive Surface Coater	45
U5	C005	Line 5 Solvent or Water Based Adhesive Surface Coater	55
U8	C0006	Line 8 Solvent Based Adhesive Surface Coater	73

New Jersey Department of Environmental Protection
Reason for Application

Permit Being Modified

Permit Class: BOP **Number:** 170001

**Description
of Modifications:**

This Significant Modification including the following changes:

-Modification application BOP210001 was incorporated.

-The Responsible Official was changed to Joe Derr

-Included PM-2.5 PTE Emissions for U1, U2, U3, U4, U5, and U8 consistent with N.J.A.C. 7:27-22

-For U1, U2 and U3 (Water Based Adhesive Surface Coaters), OS1 and OS2 were combined into a single operating scenario named "Water Based Coating with or without Silicone" and a monitoring requirement for the VOC TPY limits was added to require monthly calculations based on a rolling 12 month period.

-For U4 (Water Based Adhesive Surface Coater), OS1 and OS2 were combined into a single operating scenario named "Water Based Coating with or without Silicone-Primer" and OS5 and OS6 were combined into a single operating scenario named "Water Based Coating with or without Silicone-Main"

-Xylene and toluene emissions were removed from U1, U2, U3 and U4 because the emissions are below reporting threshold

-The maximum allowable VOC content in coatings for U1, U2, U3 and U4 was increased to 0.6% by weight, based on the worst-case coating. The VOC lb/hr limit during surface coating for these emission units was increased to 5.38 lb/hr. There are no changes to VOC tpy emissions for U1, U2, U3 & U4.

-The VOC lb/hr limit for U5 was increased to 16.5 lb/hr based on stack test TST170001. There is no change to VOC tpy emissions for U5.

-The toluene lb/hr limit for U5 OS1 was increased to 11.53 lb/hr based on the worst-case coating. There is no change to toluene tpy emissions for U5.

-The coating usage limit for U5 was increased to 550 lb/hr based on stack test TST170001

-Federal requirements were moved to GR1 NSPS Subpart RR Applicability Determination Requirement for U3-U5 & U8, GR2 NSPS Subparts A & RR Requirements for U5 & U8 and GR3 MACT Subparts A & JJJJ Requirements for U5 & U8.

-Requirements to continuously monitor oxygen were removed for U5 and U8 because the Total Hydrocarbon Continuous Emission Monitor limits are not corrected to a percentage of oxygen.

-An additional MACT JJJJ compliance option was added for U5 and U8 where compliance is demonstrated by meeting an organic HAP control efficiency of $\geq 95\%$. See GR3 Ref#16.

New Jersey Department of Environmental Protection
Reason for Application

-Performance test requirements were added to U5 and U8 to demonstrate compliance with HAP capture and control efficiencies required by MACT JJJJ

-The distance to property line for PT2-PT6 (U2) was changed from 130 feet to 150 feet.

-The stack height for PT13 (U8) was changed from 35 feet to 40 feet and the distance to property line for PT13 was changed from 350 feet to 150 feet.

-TPY PTE from combustion sources was changed to be based on the permitted annual natural gas usage. This results in a reduction of facility wide NOx, CO, TSP and PM-10 TPY emissions.

-Monitoring and recordkeeping requirements were added to all short-term and long-term ammonia emission limits for U1-U5.

-The minimum operating temperature for CD2 was increased from 1,500 degrees F to 1,525 degrees F in accordance with manufacturer specifications.

-An option to use a signal to continuously monitor that the position of the damper is allowing exhaust to the thermal oxidizer (CD1) during solvent coating operations was added to U5 OS1 Ref#19.

BOP200001

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item: FC

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	General Provisions: The permittee shall comply with all applicable provisions of N.J.A.C. 7:27-1. [N.J.A.C. 7:27- 1]	None.	None.	None.
2	Control and Prohibition of Open Burning: The permittee is prohibited from open burning of rubbish, garbage, trade waste, buildings, structures, leaves, other plant life and salvage. Open burning of infested plant life or dangerous material may only be performed with a permit from the Department. [N.J.A.C. 7:27- 2]	None.	None.	Obtain an approved permit: Prior to occurrence of event (prior to open burning). [N.J.A.C. 7:27- 2]
3	Prohibition of Air Pollution: The permittee shall not emit into the outdoor atmosphere substances in quantities that result in air pollution as defined at N.J.A.C. 7:27-5.1. [N.J.A.C. 7:27- 5]	None.	None.	None.
4	Prevention and Control of Air Pollution Control Emergencies: Any person responsible for the operation of a source of air contamination set forth in Table 1 of N.J.A.C. 7:27-12 is required to prepare a written Standby Plan, consistent with good industrial practice and safe operating procedures, and be prepared for reducing the emission of air contaminants during periods of an air pollution alert, warning, or emergency. Any person who operates a source not set forth in Table 1 of N.J.A.C. 7:27-12 is not required to prepare such a plan unless requested by the Department in writing. [N.J.A.C. 7:27-12]	None.	None.	Comply with the requirement: Upon occurrence of event. Upon proclamation by the Governor of an air pollution alert, warning, or emergency, the permittee shall put the Standby Plan into effect. In addition, the permittee shall ensure that all of the applicable emission reduction objectives of N.J.A.C. 7:27-12.4, Table I, II, and III are complied with whenever there is an air pollution alert, warning, or emergency. [N.J.A.C. 7:27-12]
5	Emission Offset Rules: The permittee shall comply with all applicable provisions of Emission Offset Rules. [N.J.A.C. 7:27-18]	None.	None.	None.
6	Emission Statements: The permittee shall comply with all the applicable provisions of N.J.A.C. 7:27-21. [N.J.A.C. 7:27-21]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
7	Compliance Certification: The permittee shall submit an annual Compliance Certification for each applicable requirement, pursuant to N.J.A.C. 7:27-22.19(f). [N.J.A.C. 7:27-22]	None.	None.	<p>Submit an Annual Compliance Certification: Annually to the Department and to EPA within 60 days after the end of each calendar year during which this permit was in effect. The Compliance Certification shall be certified pursuant to N.J.A.C. 7:27-1.39 by the responsible official and submitted electronically through the NJDEP online web portal. The certification should be printed for submission to EPA.</p> <p>The NJDEP online web portal can be accessed at: http://www.state.nj.us/dep/online/. The Compliance Certification forms and instructions for submitting to EPA are available by selecting Documents and Forms and then Periodic Compliance Certification. [N.J.A.C. 7:27-22]</p>
8	Prevention of Air Pollution from Consumer Products and Architectural Coatings: The permittee shall comply with all applicable provisions of N.J.A.C. 7:27-24 and [N.J.A.C. 7:27-23]	None.	None.	None.
9	Any operation of equipment which causes off-property effects, including odors, or which might reasonably result in citizen's complaints shall be reported to the Department to the extent required by the Air Pollution Control Act, N.J.S.A. 26:2C-19(e). [N.J.S.A. 26: 2C-19(e)]	Other: Observation of plant operations. [N.J.S.A. 26: 2C-19(e)].	Other: Maintain a copy of all information submitted to the Department. [N.J.S.A. 26: 2C-19(e)].	<p>Notify by phone: Upon occurrence of event. A person who causes a release of air contaminants in a quantity or concentration which poses a potential threat to public health, welfare or the environment or which might reasonably result in citizen complaints shall immediately notify the Department. Such notification shall be made by calling the Environmental Action Hotline at (877) 927-6337. [N.J.S.A. 26: 2C-19(e)]</p>
10	Prevention of Significant Deterioration: The permittee shall comply with all applicable provisions of Prevention of Significant Deterioration (PSD). [40 CFR 52.21]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	The permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Asbestos, Subpart M. [40 CFR 61]	Other: Comply with 40 CFR 61.145 and 61.150 when conducting any renovation or demolition activities at the facility. [40 CFR 61].	Other: Comply with 40 CFR 61.153 when conducting any renovation or demolition activities at the facility. [40 CFR 61].	Comply with the requirement: Upon occurrence of event. The permittee shall comply with 40 CFR 61.153 when conducting any renovation or demolition activities at the facility. [40 CFR 61]
12	Protection of Stratospheric Ozone:1) If the permittee manufactures, transforms, destroys, imports, or exports a Class I or Class II substance, the permittee is subject to all the requirements as specified at 40 CFR 82, Subpart A; 2) If the permittee performs a service on motor "fleet" vehicles when this service involves an ozone depleting substance refrigerant (or regulated substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified at 40 CFR 82, Subpart B. 3) The permittee shall comply with the standards for labeling of products containing or manufactured with ozone depleting substances pursuant to 40 CFR 82, Subpart E. 4). The permittee shall comply with the standards for recycling and emission reductions of Class I and Class II refrigerants or a regulated substitute substance during the service, maintenance, repair, and disposal of appliances pursuant to 40 CFR 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B. 5) The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program (SNAP) promulgated pursuant to 40 CFR 82, Subpart G. [40 CFR 82]	Other: Comply with 40 CFR 82 Subparts A, B, E, F, and G. [40 CFR 82].	Other: Comply with 40 CFR 82 Subparts A, B, E, F, and G. [40 CFR 82].	Comply with the requirement: Upon occurrence of event. The permittee shall comply with 40 CFR 82 Subparts A, B, E, F, and G. [40 CFR 82]

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**New Jersey Department of Environmental Protection
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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
13	Deviation Reports: The permittee shall submit to the Department a certified six-month Deviation Report relating to testing and monitoring required by the operating permit. [N.J.A.C. 7:27-22.19(d)3], [N.J.A.C. 7:27-22.19(e)], and [N.J.A.C. 7:27-22.19(c)]	None.	Other: The permittee shall maintain deviation reports for a period of five years from the date each report is submitted to the Department. [N.J.A.C. 7:27-22.19(a)] and [N.J.A.C. 7:27-22.19(e)].	Submit a report: As per the approved schedule. The six-month deviation reports for the period from January 1 through June 30 shall be submitted by July 30 of the same calendar year, and for the period from July 1 through December 31, shall be submitted by January 30 of the following calendar year. The annual compliance certification required by N.J.A.C. 7:27-22.19(f) may also be considered as your six-month Deviation Report for the period from July 1 – December 31, if submitted by January 30 of the following calendar year. The reports shall be certified pursuant to N.J.A.C. 7:27-1.39 by the responsible official and submitted electronically through the NJDEP online web portal. The NJDEP online web portal can be accessed at: http://www.state.nj.us/dep/online/ . The Compliance Certification forms are available by selecting Documents and Forms and then Periodic Compliance Certification. [N.J.A.C. 7:27-22]
14	Used Oil Combustion: No person shall combust used oil except as authorized pursuant to N.J.A.C. 7:27-20. [N.J.A.C. 7:27-20.2]	None.	None.	Comply with the requirement: Prior to occurrence of event (prior to burning used oil) either register with the Department pursuant to N.J.A.C. 7:27-20.3 or obtain a permit issued by the Department pursuant to N.J.A.C. 7:27-8 or 7:27-22, whichever is applicable. [N.J.A.C. 7:27-20.2(d)]
15	Prevention of Accidental Releases: Facilities producing, processing, handling or storing a chemical, listed in the tables of 40 CFR Part 68.130, and present in a process in a quantity greater than the listed Threshold Quantity, shall comply with all applicable provisions of 40 CFR 68. [40 CFR 68]	Other: Comply with 40 CFR 68. [40 CFR 68].	Other: Comply with 40 CFR 68. [40 CFR 68].	Other (provide description): Other. Comply with 40 CFR 68 as described in the Applicable Requirement. [40 CFR 68]

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
16	The Department and its authorized representatives shall have the right to enter and inspect any activity subject to N.J.A.C. 7:27-22, or portion thereof, pursuant to N.J.A.C. 7:27-1.31. [N.J.A.C. 7:27-22.16(g)9]	None.	None.	None.
17	The permittee shall pay fees to the Department pursuant to N.J.A.C. 7:27. [N.J.A.C. 7:27-22.16(g)10]	None.	None.	None.
18	Each permittee shall meet all requirements of the approved source emissions testing and monitoring protocol during the term of the operating permit. Whenever the permittee makes a replacement, modification, change or repair of a certified CEMS or COMS that may significantly affect the ability of the system to accurately measure or record data, the permittee must recertify the CEMS or COMS in accordance with Section V.B. and Appendix E of Technical Manual 1005. The permittee is responsible for any downtime associated with the replacement, modification, change or repair of the CEMS or COMS. [N.J.A.C. 7:27-22.18(j)]	None.	None.	Comply with the requirement: Upon occurrence of event. The permittee is responsible for contacting the Emission Measurement Section to determine the need for recertification and/or to initiate the recertification process. [N.J.A.C. 7:27-22.18(j)]
19	Each process monitor must be operated at all times when the associated process equipment is operating except during service outage time not to exceed 24 hours per calendar quarter. [N.J.A.C. 7:27-22.16(a)]	None.	Recordkeeping by manual logging of parameter or storing data in a computer data system upon occurrence of event. The permittee must keep a service log to document any outage. [N.J.A.C. 7:27-22.16(o)]	None.
20	Continuous recording for process monitors must be at a sufficient frequency and resolution to be able to document compliance or non-compliance in accordance with Technical Manual 1005 for CEMS (TM1005(B)(3)). [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
21	Stack testing after permit expiration: If an operating permit has expired, the conditions of the operating permit, including the requirements for stack testing during the expired permit term, remain enforceable until the operating permit is reissued. [N.J.A.C. 7:27-22.30(j)] and [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item: IS1 44 Direct-Fired Space Heaters, less than 1 MM BTU/hr, burning natural gas

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Opacity <= 20 % , exclusive of condensed water vapor, except for 3 minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-6.2(d)] and. [N.J.A.C. 7:27- 6.2(e)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item: GR1 NSPS Subpart RR Requirement for U3-U5 & U8

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	The owner or operator of an affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR Part 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR Part 60.442(a) and all other sections of this subpart RR. NSPS Subpart RR. [40 CFR 60.440(b)]	Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). [40 CFR 60.445(d)]	Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. The Permittee shall record a 12 month record of the amount of solvent applied in the coating at the facility. Solvent applied per consecutive 12-month period shall be calculated by the sum of the solvent applied during any one month added to the sum of the solvent applied during the preceeding 11 months. [40 CFR 60.445(d)]	Comply with the requirement: Upon occurrence of event. Upon exceeding a VOC input of 45 Mg (50 tons) to the coating process in any consecutive 12-month period, the Permittee shall comply with the requirements of 40 CFR 60.442(a) and all other sections of Subpart RR. [40 CFR 60.440(b)]

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item: GR2 NSPS Subparts A & RR Requirements for U5 & U8

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	All requests, reports, applications, submittals, and other communications to the Administrator pursuant to Part 60 shall be submitted in duplicate to the Regional Office of US Environmental Protection Agency. Submit information to: Director, Division of Enforcement & Compliance Assistance, US EPA, Region 2, 290 Broadway, New York, NY 10007-1866. (NSPS Subpart A) [40 CFR 60.4(a)]	None.	None.	Submit a report: As per the approved schedule to EPA Region 2 as required by 40 CFR 60. [40 CFR 60.4(a)]
2	Copies of all information submitted to EPA pursuant to 40 CFR Part 60, must also be submitted to the appropriate Regional Enforcement Office of NJDEP. (NSPS Subpart A) [40 CFR 60.4(b)]	None.	None.	Submit a report: As per the approved schedule to the appropriate Regional Enforcement Office of NJDEP as required by 40 CFR 60. [40 CFR 60.4(b)]
3	The owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). The notification shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of facility before and after the change and the expected completion date of the change. Notification shall be postmarked within 60 days or as soon as practicable before any change is commenced. The Administrator may request additional relevant information subsequent to this notice. (NSPS Subpart A) [40 CFR 60.7(a)(4)]	None.	None.	Submit notification: Upon occurrence of event to EPA Region 2 and the appropriate Regional Enforcement Office of NJDEP as required by 40 CFR 60.7. [40 CFR 60.7(a)(4)]

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
4	The owner or operator shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, any malfunction of air pollution control equipment or any periods during which continuous monitoring system or monitoring device is inoperative. (NSPS Subpart A) [40 CFR 60.7(b)]	None.	Recordkeeping by manual logging of parameter or storing data in a computer data system upon occurrence of event. The records should be kept in a permanent form suitable for inspections. [40 CFR 60.7(b)]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): Semi-annually beginning on the 30th day of the 6th month following initial performance tests. The report shall contain the information required in 40 CFR 60.7(b) and be postmarked by the 30th day following the end of each six-month period. The report shall be submitted to the EPA Region 2 Administrator and the appropriate Regional Enforcement Office of NJDEP and be in the format specified at 40 CFR Part 60.7(c) and 40 CFR Part 60.7(d). [40 CFR 60.7(c)]

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	Each owner or operator required to install a continuous monitoring device shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form (see section 60.7(d)) to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. (NSPS Subpart A) [40 CFR 60.7(c)]	None.	<p>Other: Written reports of excess emissions shall include the following information:</p> <p>(1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.</p> <p>(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.</p> <p>(3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and nature of the system repairs or adjustments.</p> <p>(4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.[40 CFR 60.7(c)].</p>	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): Semi-annually beginning on the 30th day of the 6th month following initial performance tests. The report shall be postmarked by the 30th day following the end of each six-month period. The report shall be submitted to the EPA Region 2 Administrator and the appropriate Regional Enforcement Office of NJDEP and be in the format specified at 40 CFR Part 60.7(c) and 40 CFR Part 60.7(d). [40 CFR 60.7(c)]

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	The owner or operator shall maintain a file, suitable for inspection, of all monitoring measurements as indicated in Recordkeeping Requirement column. (NSPS Subpart A) [40 CFR 60.7(f)]	None.	Other: The file shall include all measurements (including continuous monitoring system, monitoring device, and performance testing measurements), all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, all adjustments/maintenance performed on these systems or devices, and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the dates of the record, except as prescribed in 40 CFR 60.7(f)(1) through (3). Sources subject to 40 CFR 70, are required to retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application, per 40 CFR 70.6(a)(3)(ii)(B).[40 CFR 60.7(f)].	None.
7	At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operation and maintenance procedures, and inspection of the source. (NSPS Subpart A) [40 CFR 60.11(d)]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
8	No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. NSPS Subpart A. [40 CFR 60.12]	None.	None.	None.
9	All continuous monitoring systems or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Procedures for location of continuous monitoring systems contained in the applicable Performance Specifications of Appendix B of 40 CFR Part 60 shall be used. (NSPS Subpart A) [40 CFR 60.13(f)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
10	The owner or operator of all continuous monitoring systems (other than opacity) shall reduce all data to 1-hour averages for time periods. One-hour period is defined in 40 CFR 60.2 as any 60-minute period commencing on the hour. For a full operating hour, 1-hour averages shall be computed from at least four valid data points, i.e., one data point in each of the 15-minute quadrants of the hour. For a partial operating hour (any clock hour with less than 60 minutes of unit operation), the owner or operator shall follow all the procedures specified at 40 CFR 60.13(h)(2) to compute 1-hour averages. Data recorded during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages computed under this paragraph. The owners and operators complying with the requirements in 40 CFR 60.7(f)(1) or (2) must include any data recorded during periods of monitor breakdown or malfunction in the data averages. Either arithmetic or integrated averaging of all data may be used to calculate the hourly averages. The data may be recorded in reduced or nonreduced form (e.g., ppm pollutant and percent O ₂ or ng/J of pollutant). (NSPS Subpart A) [40 CFR 60.13(h)(2)]	None.	Other: (See Applicable Requirement).[40 CFR 60.13(h)].	None.
11	The owner or operator shall notify the Administrator of the proposed replacement of components, upon triggering reconstruction as defined at 40 CFR 60.15. (NSPS Subpart A) [40 CFR 60.15]	None.	None.	Submit notification: At a common schedule agreed upon by the operator and the Administrator. The notification shall include information listed under 40 CFR Part 60.15(d). The notification shall be postmarked 60 days (or as soon as practicable) before construction of the replacements is commenced. [40 CFR 60.15(d)]

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
12	Changes in time periods for submittal of information and postmark deadlines set forth in this subpart, may be made only upon approval by the Administrator and shall follow procedures outlined in 40 CFR Part 60.19. (NSPS Subpart A) [40 CFR 60.19]	None.	None.	None.
13	VOC (Total) >= 90 % reduction. (NSPS Subpart RR). [40 CFR 60.442(a)(2)(i)]	VOC (Total): Monitored by weighted average VOC content calculations each month during operation, based on a 1 month average. Calculations shall follow the procedures specified at 40 CFR Part 60.443(b) and 60.443(d). [40 CFR 60.443(d)]	VOC (Total): Recordkeeping by manual logging of parameter each month during operation. The owner or operator shall maintain records of all coatings used and the results of the reference test method specified in 40 CFR Part 60.446(a), or the manufacturer's formulation data used to determine the VOC content of those coatings. [40 CFR 60.445(a)]	Submit a report: At a common schedule agreed upon by the operator and the Administrator The owner or operator shall report to the Administrator quarterly of the exceedences of the VOC emission limits specified at 40 CFR Part 60.442. If no such exceedences occur, a report stating this shall be submitted to the Administrator semi-annually. [40 CFR 60.447(b)]
14	The owner or operator shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in 40 CFR Part 60.443(b) to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40 CFR Part 60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with 40 CFR Part 60.442(a)(2). NSPS Subpart RR. [40 CFR 60.443(d)]	Other: Monitored by comparing the monthly required overall VOC emission reduction to the overall VOC reduction of the most recent performance test. Monthly.[40 CFR 60.443].	Other: The owner or operator shall maintain a record of all comparisons to demonstrate compliance with 40 CFR Part 60.442. Monthly.[N.J.A.C. 7:27-22.16(o)].	None.
15	The owner or operator shall install, calibrate operate, and maintain a monitoring device that continuously indicates and records the temperature of the destruction device's exhaust gases. (NSPS Subpart RR) [40 CFR 60.445(e)]	Monitored by temperature instrument continuously, based on a 3 hour rolling average. [40 CFR 60.445(e)]	Recordkeeping by strip chart, round chart or data acquisition (DAS) system / electronic data storage continuously. [40 CFR 60.445(e)]	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
16	The owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 50 degrees F below the temperature of the device during the most recent performance test complying with 40 CFR Part 60.442(a)(2). (NSPS Subpart RR) [40 CFR 60.443(e)]	None.	Recordkeeping by manual logging of parameter upon occurrence of event. [40 CFR 60.443(e)]	Submit a report: At a common schedule agreed upon by the operator and the Administrator. The owner or operator shall report to the Administrator, at the frequency specified at 40 CFR Part 60.7(c) all instances when the incinerator temperature drops as specified. If no such periods occur, the owner or operator shall state this in the report. [40 CFR 60.447(c)]
17	After the initial performance test required for all affected facilities under 40 CFR Part 60.8, compliance with the VOC emission limitation and percentage reduction requirements under 40 CFR Part 60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard. (NSPS Subpart RR) [40 CFR 60.443(f)]	Other: Monitored by calculations. Monthly. Calculations shall follow the procedures specified in 40 CFR Part 60.443.[40 CFR 60.443(f)].	Other: The owner or operator shall maintain a calendar month record of all calculations used to demonstrate compliance with 40 CFR Part 60.442. Monthly.[40 CFR 60.443(f)].	None.
18	Startups and shutdowns are normal operation for this source (coating line used in the manufacture of pressure sensitive tape and label materials) category. Emissions from these operations are to be included when determining if the standard specified at 40 CFR Part 60.442(a)(2) is being attained. (NSPS Subpart RR) [40 CFR 60.443(j)]	None.	None.	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
19	The owner or operator of an affected facility controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system. (NSPS Subpart RR) [40 CFR 60.445(g)]	Monitored by pressure indicator continuously to accurately indicate the hood or enclosure's normal operation. Or maintain integrity of hood or enclosure system interlocking device once per shift. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. Or recordkeeping by manual logging of observations of the interlocking device in a logbook or readily accessible computer memories. Once per shift. [N.J.A.C. 7:27-22.16(o)]	None.
20	Records of the measurements required in 40 CFR Part 60.443 and 60.445 must be retained for at least two years following the date of the measurements. (NSPS Subpart RR) [40 CFR 60.445(h)]	None.	None.	None.
21	The VOC content per unit of coating solids applied and compliance with 40 CFR Part 60.442(a)(1) shall be determined by either Method 24 (in 40 CFR Part 60, Appendix A) and the equations specified in 40 CFR Part 60.443 or by manufacturer's formulation data. In the event of any inconsistency between a Method 24 (in 40 CFR Part 60, Appendix A) test and manufacturers' formulation data, the Method 24 test will govern. The EPA may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate. NSPS Subpart RR. [40 CFR 60.446(a)]	None.	None.	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
22	Method 25 (in 40 CFR Part 60, Appendix A) shall be used to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere. 40 CFR Part 60, appendix A, Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flowrate, molecular weight, and moisture of all sampled gas streams. For Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the EPA. (NSPS Subpart RR) [40 CFR 60.446(b)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item: GR3 MACT Subparts A & JJJJ Requirements for U5 & U8

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	The owner or operator of an affected source required to do performance testing under a relevant standard shall conduct a performance test. Each performance test shall consist of three (3) separate runs and the arithmetic mean of the results of the three runs shall apply as specified in 40 CFR 63.7(e)(3). (MACT Subpart A) [40 CFR 63.7(a)(2)]	None.	Recordkeeping by manual logging of parameter or storing data in a computer data system upon occurrence of event. The owner or operator shall maintain files of all information, including all reports and notifications, required by 40 CFR 63 in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each record. At minimum, the most recent two years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on a computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]	Conduct a performance test: As per the approved schedule. Within 180 days of the compliance date of the source. [40 CFR 63.7(a)(2)]
2	The owner or operator of an affected source must notify the Administrator in writing before the performance test is scheduled. (MACT Subpart A) [40 CFR 63.7(b)(1)]	None.	Recordkeeping by other recordkeeping method (provide description) upon occurrence of event. The owner or operator shall maintain files of all information, including all reports and notifications, required by 40 CFR 63 in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each record. At minimum, the most recent two years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on a computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]	Submit notification: As per the approved schedule. At least 60 days before the performance test is initially scheduled. Per 40 CFR 63.7(b)(2), the owner or operator shall notify the Administrator as soon as practicable and without delay prior to the scheduled test and specify the date when the performance test is rescheduled, if the owner or operator is unable to conduct the performance test as initially scheduled. [40 CFR 63.7(b)(1)]

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The owner or operator of an affected source shall develop, before conducting a required performance test and, if requested by the Administrator, shall submit a site-specific plan to the Administrator for approval. The test plan shall include: test program summary, test schedule, data quality objectives, and an internal and external quality assurance (QA) program. An internal and external quality assurance (QA) program shall include the information prescribed in 40 CFR 63.7(c)(2)(ii) and (c)(2)(iii). (MACT Subpart A) [40 CFR 63.7(c)(2)(i)]	None.	Recordkeeping by other recordkeeping method (provide description) at no required frequency. The owner or operator shall maintain files of all information recorded in a form suitable and readily available for inspection. The files shall be retained for at least 5 years following the date of each record. At minimum, the most recent two years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on a computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]	Submit a plan: As per the approved schedule. The site- specific test plan shall be submitted upon the Administrator's request at least 60 calendar days before the performance test is scheduled. [40 CFR 63.7(c)(2)(iv)]
4	The owner or operator of an affected source must analyze performance audit (PA) samples during each performance test. The owner or operator must request performance audit materials 30 days prior to the test date. [40 CFR 63.7(c)(4)(i)]	None.	None.	None.
5	The owner or operator shall conduct the performance test under such conditions as the Administrator specifies based on representative performance. Upon request, the owner or operator shall make available to the Administrator such record. [40 CFR 63.7(e)(1)]	None.	None.	None.
6	The owner or operator of an affected source shall report the results of the performance test to the Administrator. (MACT Subpart A) [40 CFR 63.7(g)(1)]	None.	Recordkeeping by other recordkeeping method (provide description) upon occurrence of event. Results of performance test shall be maintained and recorded in a form suitable and readily available for expeditious inspection and review for at least 5 years following the date of each record. At minimum, the most recent two years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on a computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]	Submit a report: As per the approved schedule. The owner or operator shall report the results of the performance test before the close of business on the 60th day following the completion of performance test. [40 CFR 63.10(d)(2)]

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
7	The owner or operator of an affected source shall conduct monitoring as specified in the relevant standard, unless otherwise specified by the Administrator. (MACT Subpart A) [40 CFR 63.8(b)(1)]	None.	None.	None.
8	The owner or operator of an affected source must keep the necessary parts for routine repairs of the affected continuous monitoring system (CMS) equipment readily available. (MACT Subpart A) [40 CFR 63.8(c)(1)(ii)]	None.	None.	None.
9	The owner or operator of the affected source shall take corrective action and conduct retesting, when the continuous monitoring system (CMS) is out of control. (MACT Subpart A) [40 CFR 63.8(c)(7)(ii)]	None.	None.	None.
10	The owner or operator of a continuous monitoring system (CMS) shall report all out-of-control periods. (MACT Subpart A) [40 CFR 63.8(c)(8)]	None.	Recordkeeping by other recordkeeping method (provide description) upon occurrence of event. The owner or operator shall maintain records all CMS malfunction or inoperative periods (including out of control periods), all maintenance and adjustments performed for CMS as specified in 40 CFR 63.10(b) and (c). The reports shall be maintained and recorded in a form suitable and readily available for expeditious inspection and review for at least 5 years following the date of each record. At minimum, the most recent two years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on a computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]	Submit a report: As per the approved schedule. The report shall be delivered by the 30th day following the end of each calendar half. The report shall consist of a letter containing: name, title, and signature of the owner or operator. The owner or operator shall report within 24 hours the actions inconsistent with the malfunction plan, and a follow up report shall be submitted within 2 weeks after the commencing actions. [40 CFR 63.10(e)(3)]

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	The owner or operator of an affected source that is required to use a continuous monitoring system (CMS) and is subject to monitoring requirements shall develop and implement a CMS quality control program including a site- specific performance evaluation test plan. In addition, each quality control program shall include at minimum as specified in paragraph 40 CFR 63.8(d)(2)(i) to (vi). (MACT Subpart A) [40 CFR 63.8(d)(2)]	None.	Recordkeeping by other recordkeeping method (provide description) upon occurrence of event. The owner or operator shall keep these written procedures on record for the life of the affected source and make available for inspection upon request. The owner or operator shall keep the previous version of the plan for a period of 5 years after each revision. [40 CFR 63.8(d)(3)]	None.
12	The owner or operator of an affected source shall notify the Administrator that the source becomes subject to a relevant standard. The notification shall include the information as specified in 40 CFR 63.9(b)(2). (MACT Subpart A) [40 CFR 63.9(b)(2)]	None.	Other: Notification records shall be maintained for at least 5 years following the date of each record. At minimum, the most two recent years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on a computer floppy disks, on magnetic tape disks, or on microfiche.[40 CFR 63.10(b)(1)].	Submit notification: As per the approved schedule. Within 120 calendar days after the source becomes subject to the relevant standard, if initial startup of the affected source is before the effective date of the standard. The notification shall be submitted to EPA Region II and the appropriate Regional Enforcement Office of NJDEP. [40 CFR 63.9(b)(2)]
13	The owner or operator shall submit all information required under 40 CFR 63 to the Regional Enforcement Office of NJDEP. In addition, per 40 CFR 63.9(a)(4)(ii), the owner or operator shall send a copy of each report submitted to NJDEP under 40 CFR 63 to Director, Division of Enforcement and Compliance Assistance, USEPA Region 2, 290 Broadway, New York, NY 10007-1866. (MACT Subpart A) [40 CFR 63.10(a)(4)(ii)]	None.	Other: The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)].	Other (provide description): As per the approved schedule. Submit reports and notifications as required by 40 CFR 63 to EPA Region 2 and NJDEP. [40 CFR 63.13(b)]

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
14	General recordkeeping requirements. The owner or operator shall maintain files of all information (including all reports and notifications) required by 40 CFR 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. The owner or operator shall maintain relevant records per 40 CFR 63.10(b)(2) and 40 CFR 63.10(c). (MACT Subpart A) [40 CFR 63.10(b)(1)]	None.	None.	None.
15	Organic HAPs <= 4 % by weight. The monthly average of all coating materials used must not exceed 0.04 kg organic HAP per kg coating material. (MACT Subpart JJJJ). [40 CFR 63.3320(b)(2)]	Organic HAPs: Monitored by calculations each month during operation, based on a 1 month average. Use equation 8 of 40 CFR 63.3370 to determine compliance with 40 CFR 63.3320(b)(2) in accordance with 40 CFR 63.3370(c)(5)(ii). Use the procedures specified in 40 CFR 63.3360(c) to determine the organic HAP content of each coating material used. [40 CFR 63.3370(c)(3)]	Organic HAPs: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Maintain records of organic HAP content data, coating material usage, organic HAP usage, volatile matter usage, coating solids usage and compliance demonstrations for "as-applied" coatings. [40 CFR 63.3410(a)]	None.
16	Organic HAPs >= 95 % HAP reduction. The permittee must limit organic HAP emissions to no more than 5% of the organic HAP applied for each month. (MACT Subpart JJJJ). [40 CFR 63.3320(b)(1)]	Organic HAPs: Monitored by parametric monitoring system continuously. Follow the procedures set out in 40 CFR 63.3370(l) to determine compliance. Use Equation 15 of 40 CFR 63.3370 to calculate overall organic HAP control efficiency monthly. [40 CFR 63.3370(a)(5)(i)]	Organic HAPs: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. [40 CFR 63.3410(a)(1)(ii)]	None.
17	The permittee may demonstrate compliance with 40 CFR 63 Subpart JJJJ using 40 CFR 63.3320(b)(1) only after conducting the initial performance test required by 40 CFR 63.3360(a)(2) and demonstrating compliance with the HAP reduction efficiency. See the stack test requirements below and in U5 and U8 OS Summary. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
18	The permittee shall conduct an initial performance test to determine the capture efficiency of each capture system. (MACT Subpart JJJJ) [40 CFR 63.3360(a)(2)(i)]	Other: The initial performance tests shall be conducted according to the procedures specified at 40 CFR 63.3360(f). [40 CFR 63.3360(a)(2)(i)].	Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Maintain records of the capture efficiency and performance test results. [40 CFR 63.3410(a)(1)(v)]	Submit a report: Within 60 days of stack testing. Submit the results of each performance test according to the procedures specified in 40 CFR 63.3400(f). See the stack test requirements in U5 and U8 OS Summary. [40 CFR 63.3400(f)]
19	The permittee shall perform an initial performance test and periodic performance tests once every 5 years for each thermal oxidizer to determine the destruction or removal efficiency. (MACT Subpart JJJJ) [40 CFR 63.3360(a)(2)]	Monitored by stack emission testing once initially and every 5 years (based on completion date of the last stack test), based on the average of three 1-hour tests. The performance tests shall be conducted according to the procedures specified at 40 CFR 63.3360(e). [40 CFR 63.3360(a)(2)]	Recordkeeping by stack test results upon occurrence of event. [40 CFR 63.3410(a)(1)(v)]	Submit a report: Within 60 days of stack testing. Submit the results of each performance test according to the procedures specified in 40 CFR 63.3400(f). See the stack test requirements in U5 and U8 OS Summary. [40 CFR 63.3400(f)]
20	After each performance test required by 40 CFR 63 Subpart JJJJ, the permittee shall submit a modification to incorporate the operating parameter limit determined by the performance test into the permit. [N.J.A.C. 7:27-22.16(a)]	None.	None.	Submit the required air permit application(s): As per the approved schedule. The permittee shall submit the application(s) within 60 days from the date of the EMS stack test review letter to the facility, indicating compliance with 40 CFR 63 Subpart JJJJ. [N.J.A.C. 7:27-22.16(o)]

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
21	The Permittee must submit semiannual compliance reports in accordance with 40 CFR 63.3400(c) for each semiannual period ending June 30 and December 31 of each year. (MACT Subpart JJJJ) [40 CFR 63.3400(c)]	None.	<p>Other: Each semiannual compliance report shall contain:</p> <p>(i) Company name and address.</p> <p>(ii) Statement by a responsible official with that official's name, title, and signature certifying that accuracy of the content of the report.</p> <p>(iii) Date of report and beginning and ending dates of the reporting period.</p> <p>(iv) If there are no deviations from any emission limitations (emission limit or operating limit), a statement that there were no such deviations during the reporting period, and that no continuous monitoring system (CMS) was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.</p> <p>(v) For each deviation from an emission limitation (emission limit or operating limit), the compliance report must contain the following information:</p> <p>(A) The total operating time of each affected source during the reporting period.</p> <p>(B) Information on the number, duration, and cause of the deviations (including unknown cause), if applicable, and corrective action taken.</p> <p>(C) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks. [40 CFR 63.3400(c)].</p>	<p>Submit a report: As per the approved schedule. The compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.</p> <p>The report shall be submitted to the EPA Region II Administrator and the appropriate Regional Enforcement Office of NJDEP. [40 CFR 63.3400(c)]</p>

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
22	The permittee shall comply with the General Provisions of 40 CFR 63 as shown in Table 2 of 40 CFR 63 Subpart JJJJ. (MACT Subpart JJJJ) [40 CFR 63.3340(d)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Line 1 Water Based Adhesive Surface Coater

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Particulate Emissions <= 1.32 lb/hr based on 0.02 grains per standard cubic foot of gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
2	Opacity <= 20 % , exclusive of condensed water vapor, except for three minutes in any consecutive 30 minute period. [N.J.A.C. 7:27-6.2(d)] &. [N.J.A.C. 7:27- 6.2(e)]	None.	None.	None.
3	No visible emissions except for a period of not longer than three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
4	VOC (Total) <= 3.33 tons/yr. [N.J.A.C. 7:27-22.16(a)]	<p>VOC (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and VOC content of each surface coating formulation, including any dilutants, shall be used to calculate emissions.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = VOC emissions (lb/day) Q = Material usage rate as applied (lb/day) C = VOC content of material as applied (lb VOC/lb Coating)</p> <p>For each coating, sum the daily totals for VOC emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and VOC content of each surface coating formulation used and calculated VOC emissions. The daily VOC emissions shall be summed monthly. Tons of VOC emissions per consecutive 12-month period shall be calculated by the sum of the VOC emitted during any one month added to the sum of the VOC emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
5	NOx (Total) <= 1.38 tons/yr based on the permitted annual natural gas usage. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	CO <= 1.16 tons/yr based on the permitted annual natural gas usage. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
7	Ammonia <= 5.48 tons/yr. [N.J.A.C. 7:27-22.16(e)]	<p>Ammonia: Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and ammonium hydroxide content of each surface coating formulation, including any dilutants, shall be used to calculate emissions. The potential ammonia emissions will be calculated using stoichiometry by assuming all the ammonium hydroxide dissociates into ammonia and water.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = Ammonia emissions (lb/day) Q = Material usage rate as applied (lb/day) C = Maximum potential resulting ammonia content from dissociation of ammonium hydroxide (lb Ammonia/lb Coating)</p> <p>For each coating, sum the daily totals for ammonia emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and ammonium hydroxide content of each surface coating formulation used and calculated ammonia emissions. The daily ammonia emissions shall be summed monthly. Tons of ammonia emissions per consecutive 12-month period shall be calculated by the sum of the ammonia emitted during any one month added to the sum of the ammonia emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]</p>	None.
8	Individual HAP emissions shall be below the reporting threshold values specified in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(a)]	Monitored by calculations once initially based on maximum throughput and HAP content of each coating used. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Maintain emission calculation records showing that the PTE for each HAP contained in the coatings used is below the reporting threshold in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
9	Any person, subject to the recordkeeping provision of N.J.A.C. 7:27-16, shall maintain the required records for a period of no less than five years and shall make those records available upon request of the Department or the EPA, or any duly authorized representative of the Department or the EPA. [N.J.A.C. 7:27-16.22(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Line 1 Water Based Adhesive Surface Coater

Operating Scenario: OS1 Water Based Coating with or without Silicone

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	VOC Content of Any Surface Coating Formulation as Applied \leq 2.9 lb/gal (minus water) from Table 7B (Paper Coating). [N.J.A.C. 7:27-16.7(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation (minus water) as applied, in pounds of VOC per gallon of coating, the percent by weight of any exempt organic substance and the daily volume of each surface coating applied. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	None.
2	No person shall cause, suffer, allow, or permit the installation of any surface coating or graphic arts operation to apply a surface coating formulation which does not contain water deliberately added in a planned proportion unless a coating application system having a transfer efficiency of 60 percent or greater, or as otherwise approved by the Department, is used. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.
3	VOC Content of Any Surface Coating Formulation as Applied \leq 0.6 % by weight. [N.J.A.C. 7:27-22.16(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C. 7:27-22.16(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation as applied, in pounds of VOC per pound of coating. [N.J.A.C. 7:27-22.16(o)]	None.
4	VOC (Total) \leq 5.38 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	TSP $<$ 0.05 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	Ammonia <= 1.25 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Ammonia: Monitored by calculations per change of material. For each surface coating formulation containing ammonium hydroxide used, the maximum potential lb/hr ammonia emissions shall be calculated based on the permitted coating usage limit and the ammonium hydroxide content of the formulation. The ammonia emissions shall be calculated using stoichiometry by assuming all the ammonium hydroxide is dissociated into ammonia and water. [N.J.A.C. 7:27-22.16(o)]	Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system per change of material. The permittee shall keep a record of all calculations showing the maximum potential ammonia emissions for each coating formulation containing ammonium hydroxide used. [N.J.A.C. 7:27-22.16(o)]	None.
7	Coating Usage <= 897 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
8	Coating Usage <= 21,528 lb/day. [N.J.A.C. 7:27-22.16(a)]	Coating Usage: Monitored by material balance daily, based on one calendar day. [N.J.A.C. 7:27-22.16(o)]	Coating Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system daily. Record the quantities of coating utilized, the hours of operation and coating used in pounds per day. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Line 1 Water Based Adhesive Surface Coater

Operating Scenario: OS3 Drying Oven (3.9 MM BTU/hr), Uncontrolled Emission, exhausting through PT1

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Drying oven fuel limited to natural gas only. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
2	NOx (Total) <= 0.37 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
3	CO <= 0.31 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
4	TSP < 0.05 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
5	Maximum Gross Heat Input <= 3.9 MMBTU/hr (HHV). [N.J.A.C. 7:27-22.16(a)]	None.	Other: Keep records showing maximum heat input rate.[N.J.A.C. 7:27-22.16(o)].	None.
6	Natural Gas Usage <= 27.5 MMft ³ per any consecutive 12 month period. [N.J.A.C. 7:27-22.16(e)]	Natural Gas Usage: Monitored by fuel flow/firing rate instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Natural Gas Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Cubic feet for any 12 consecutive months shall be calculated by the sum of the cubic feet consumed during any one month added to the sum of the cubic feet consumed during preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U2 Line 2 Water Based Adhesive Surface Coater

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Particulate Emissions <= 0.55 lb/hr from emission point PT2 (4,000 acfm) based on 0.02 grains per standard cubic foot of gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
2	Particulate Emissions <= 0.5 lb/hr from emission point PT3 (2,500 acfm) based on 0.02 grains per standard cubic foot of gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
3	Particulate Emissions <= 0.5 lb/hr from emission point PT4 (3,000 acfm) based on 0.02 grains per standard cubic foot of gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
4	Particulate Emissions <= 0.5 lb/hr from emission point PT5 (3,500 acfm) based on 0.02 grains per standard cubic foot of gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
5	Particulate Emissions <= 0.5 lb/hr from emission point PT6 (1,000 acfm) based on 0.02 grains per standard cubic foot of gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
6	Opacity <= 20 % from each emission point (PT2 through PT6), exclusive of condensed water vapor, except for three minutes in any consecutive 30 minute period. [N.J.A.C. 7:27-6.2(d)] & [N.J.A.C. 7:27- 6.2(e)]	None.	None.	None.
7	No visible emissions from each emission point (PT2 through PT6) except for a period of not longer than three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
8	VOC (Total) <= 3.33 tons/yr. [N.J.A.C. 7:27-22.16(a)]	<p>VOC (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and VOC content of each surface coating formulation, including any dilutants, shall be used to calculate emissions.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = VOC emissions (lb/day) Q = Material usage rate as applied (lb/day) C = VOC content of material as applied (lb VOC/lb Coating)</p> <p>For each coating, sum the daily totals for VOC emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and VOC content of each surface coating formulation used and calculated VOC emissions. The daily VOC emissions shall be summed monthly. Tons of VOC emissions per consecutive 12-month period shall be calculated by the sum of the VOC emitted during any one month added to the sum of the VOC emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
9	NOx (Total) <= 1.4 tons/yr based on the permitted annual natural gas usage. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
10	CO <= 1.18 tons/yr based on the permitted annual natural gas usage. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	Ammonia <= 5.48 tons/yr. [N.J.A.C. 7:27-22.16(e)]	<p>Ammonia: Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and ammonium hydroxide content of each surface coating formulation, including any dilutants, shall be used to calculate emissions. The potential ammonia emissions will be calculated using stoichiometry by assuming all the ammonioium hydroxide dissociates into ammonia and water.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = Ammonia emissions (lb/day) Q = Material usage rate as applied (lb/day) C = Maximum potential resulting ammonia content from dissociation of ammonium hydroxide (lb Ammonia/lb Coating)</p> <p>For each coating, sum the daily totals for ammonia emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and ammonium hydroxide content of each surface coating formulation used and calculated ammonia emissions. The daily ammonia emissions shall be summed monthly. Tons of ammonia emissions per consecutive 12-month period shall be calculated by the sum of the ammonia emitted during any one month added to the sum of the ammonia emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]</p>	None.
12	Individual HAP emissions shall be below the reporting threshold values specified in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(a)]	<p>Monitored by calculations once initially based on maximum throughput and HAP content of each coating used. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Maintain emission calculation records showing that the PTE for each HAP contained in the coatings used is below the reporting threshold in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(o)]</p>	None.
13	Any person, subject to the recordkeeping provision of N.J.A.C. 7:27-16, shall maintain the required records for a period of no less than five years and shall make those records available upon request of the Department or the EPA, or any duly authorized representative of the Department or the EPA. [N.J.A.C. 7:27-16.22(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U2 Line 2 Water Based Adhesive Surface Coater

Operating Scenario: OS1 Water Based Coating with or without Silicone

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	VOC Content of Any Surface Coating Formulation as Applied \leq 2.9 lb/gal (minus water) from Table 7B (Paper Coating). [N.J.A.C. 7:27-16.7(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation (minus water) as applied, in pounds of VOC per gallon of coating, the percent by weight of any exempt organic substance and the daily volume of each surface coating applied. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	None.
2	No person shall cause, suffer, allow, or permit the installation of any surface coating or graphic arts operation to apply a surface coating formulation which does not contain water deliberately added in a planned proportion unless a coating application system having a transfer efficiency of 60 percent or greater, or as otherwise approved by the Department, is used. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.
3	VOC Content of Any Surface Coating Formulation as Applied \leq 0.6 % by weight. [N.J.A.C. 7:27-22.16(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C. 7:27-22.16(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation as applied, in pounds of VOC per pound of coating. [N.J.A.C. 7:27-22.16(o)]	None.
4	VOC (Total) \leq 5.38 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	TSP $<$ 0.05 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	Ammonia <= 1.25 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Ammonia: Monitored by calculations per change of material. For each surface coating formulation containing ammonium hydroxide used, the maximum potential lb/hr ammonia emissions shall be calculated based on the permitted coating usage limit and the ammonium hydroxide content of the formulation. The ammonia emissions shall be calculated using stoichiometry by assuming all the ammonium hydroxide is dissociated into ammonia and water. [N.J.A.C. 7:27-22.16(o)]	Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system per change of material. The permittee shall keep a record of all calculations showing the maximum potential ammonia emissions for each coating formulation containing ammonium hydroxide used. [N.J.A.C. 7:27-22.16(o)]	None.
7	Coating Usage <= 897 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
8	Coating Usage <= 21,528 lb/day. [N.J.A.C. 7:27-22.16(a)]	Coating Usage: Monitored by material balance daily, based on one calendar day. [N.J.A.C. 7:27-22.16(o)]	Coating Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system daily. Record the quantities of coating utilized, the hours of operation and coating used in pounds per day. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U2 Line 2 Water Based Adhesive Surface Coater

Operating Scenario: OS3 Drying Oven (4.2 MM BTU/hr), Uncontrolled Emission, exhausting through emission points PT2, PT3, PT4, PT5 and PT6

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Drying oven fuel limited to natural gas only. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
2	NOx (Total) <= 0.4 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
3	CO <= 0.34 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
4	TSP < 0.05 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
5	Maximum Gross Heat Input <= 4.2 MMBTU/hr (HHV). [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing maximum heat input rate.[N.J.A.C. 7:27-22.16(o)].	None.
6	Natural Gas Usage <= 28 MMft ³ per any consecutive 12 month period. [N.J.A.C. 7:27-22.16(e)]	Natural Gas Usage: Monitored by fuel flow/firing rate instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Natural Gas Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Cubic feet for any 12 consecutive months shall be calculated by the sum of the cubic feet consumed during any one month added to the sum of the cubic feet consumed during preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.

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New Jersey Department of Environmental Protection
Facility Specific Requirements

Emission Unit: U3 Line 3 Water Based Adhesive Surface Coater

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	See Subject Item Group GR1 for NSPS Subpart RR Requirement. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	Particulate Emissions <= 1.02 lb/hr based on 0.02 grains per standard cubic foot of gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
3	Opacity <= 20 % , exclusive of condensed water vapor, except for three minutes in any consecutive 30 minute period. [N.J.A.C. 7:27-6.2(d)] &. [N.J.A.C. 7:27- 6.2(e)]	None.	None.	None.
4	No visible emissions except for a period of not longer than three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
5	VOC (Total) <= 2.78 tons/yr. [N.J.A.C. 7:27-22.16(e)]	<p>VOC (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and VOC content of each surface coating formulation, including any dilutants, shall be used to calculate emissions.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = VOC emissions (lb/day) Q = Material usage rate as applied (lb/day) C = VOC content of material as applied (lb VOC/lb Coating)</p> <p>For each coating, sum the daily totals for VOC emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	<p>VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and VOC content of each surface coating formulation used and calculated VOC emissions. The daily VOC emissions shall be summed monthly. Tons of VOC emissions per consecutive 12-month period shall be calculated by the sum of the VOC emitted during any one month added to the sum of the VOC emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]</p>	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	NO _x (Total) ≤ 1.2 tons/yr based on the permitted annual natural gas usage. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
7	CO ≤ 1.01 tons/yr based on the permitted annual natural gas usage. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
8	Ammonia ≤ 16.03 tons/yr. [N.J.A.C. 7:27-22.16(e)]	<p>Ammonia: Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and ammonium hydroxide content of each surface coating formulation, including any dilutants, shall be used to calculate emissions. The potential ammonia emissions will be calculated using stoichiometry by assuming all the ammonium hydroxide dissociates into ammonia and water.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = Ammonia emissions (lb/day) Q = Material usage rate as applied (lb/day) C = Maximum potential resulting ammonia content from dissociation of ammonium hydroxide (lb Ammonia/lb Coating)</p> <p>For each coating, sum the daily totals for ammonia emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and ammonium hydroxide content of each surface coating formulation used and calculated ammonia emissions. The daily ammonia emissions shall be summed monthly. Tons of ammonia emissions per consecutive 12-month period shall be calculated by the sum of the ammonia emitted during any one month added to the sum of the ammonia emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]</p>	None.
9	Individual HAP emissions shall be below the reporting threshold values specified in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(a)]	Monitored by calculations once initially based on maximum throughput and HAP content of each coating used. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Maintain emission calculation records showing that the PTE for each HAP contained in the coatings used is below the reporting threshold in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
10	Any person, subject to the recordkeeping provision of N.J.A.C. 7:27-16, shall maintain the required records for a period of no less than five years and shall make those records available upon request of the Department or the EPA, or any duly authorized representative of the Department or the EPA. [N.J.A.C. 7:27-16.22(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U3 Line 3 Water Based Adhesive Surface Coater

Operating Scenario: OS1 Water Based Coating with Silicone

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	VOC Content of Any Surface Coating Formulation as Applied \leq 2.9 lb/gal (minus water) from Table 7B (Paper Coating). [N.J.A.C. 7:27-16.7(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation (minus water) as applied, in pounds of VOC per gallon of coating, the percent by weight of any exempt organic substance and the daily volume of each surface coating applied. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	None.
2	No person shall cause, suffer, allow, or permit the installation of any surface coating or graphic arts operation to apply a surface coating formulation which does not contain water deliberately added in a planned proportion unless a coating application system having a transfer efficiency of 60 percent or greater, or as otherwise approved by the Department, is used. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.
3	VOC Content of Any Surface Coating Formulation as Applied \leq 0.6 % by weight. [N.J.A.C. 7:27-22.16(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C. 7:27-22.16(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation as applied, in pounds of VOC per pound of coating. [N.J.A.C. 7:27-22.16(o)]	None.
4	VOC (Total) \leq 5.38 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	TSP $<$ 0.05 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	Ammonia <= 3.66 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Ammonia: Monitored by calculations per change of material. For each surface coating formulation containing ammonium hydroxide used, the maximum potential lb/hr ammonia emissions shall be calculated based on the permitted coating usage limit and the ammonium hydroxide content of the formulation. The ammonia emissions shall be calculated using stoichiometry by assuming all the ammonium hydroxide is dissociated into ammonia and water. [N.J.A.C. 7:27-22.16(o)]	Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system per change of material. The permittee shall keep a record of all calculations showing the maximum potential ammonia emissions for each coating formulation containing ammonium hydroxide used. [N.J.A.C. 7:27-22.16(o)]	None.
7	Coating Usage <= 897 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
8	Coating Usage <= 21,528 lb/day. [N.J.A.C. 7:27-22.16(a)]	Coating Usage: Monitored by material balance daily, based on one calendar day. [N.J.A.C. 7:27-22.16(o)]	Coating Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system daily. Record the quantities of coating utilized, the hours of operation and coating used in pounds per day. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U3 Line 3 Water Based Adhesive Surface Coater

Operating Scenario: OS3 Drying Oven (3.15 MM BTU/hr), Uncontrolled Emission, exhausting through emission point PT7.

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Drying oven fuel limited to natural gas only. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
2	NOx (Total) <= 0.3 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
3	CO <= 0.25 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
4	TSP < 0.05 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
5	Maximum Gross Heat Input <= 3.15 MMBTU/hr (HHV). [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing maximum heat input rate.[N.J.A.C. 7:27-22.16(o)].	None.
6	Natural Gas Usage <= 24 MMft ³ per any consecutive 12 month period. [N.J.A.C. 7:27-22.16(e)]	Natural Gas Usage: Monitored by fuel flow/firing rate instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Natural Gas Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Cubic feet for any 12 consecutive months shall be calculated by the sum of the cubic feet consumed during any one month added to the sum of the cubic feet consumed during preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U4 Line 4 Water Based Adhesive Surface Coater

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	See Subject Item Group GR1 for NSPS Subpart RR Requirement. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	Particulate Emissions <= 0.5 lb/hr based on 0.02 grains per standard cubic foot of gas emitted from PT8. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
3	Particulate Emissions <= 1.25 lb/hr based on 0.02 grains per standard cubic foot of gas emitted from PT9. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
4	Opacity <= 20 % from each emission point (PT8 & PT9), exclusive of condensed water vapor, except for three minutes in any consecutive 30 minute period. [N.J.A.C. 7:27-6.2(d)] &. [N.J.A.C. 7:27- 6.2(e)]	None.	None.	None.
5	No visible emissions from each emission point (PT8 and PT9) except for a period of not longer than three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	VOC (Total) <= 2.79 tons/yr. [N.J.A.C. 7:27-22.16(a)]	<p>VOC (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and VOC content of each surface coating formulation, including any dilutants, shall be used to calculate emissions.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = VOC emissions (lb/day) Q = Material usage rate as applied (lb/day) C = VOC content of material as applied (lb VOC/lb Coating)</p> <p>For each coating, sum the daily totals for VOC emissions (lb/day) during each month.</p> <p>. [N.J.A.C. 7:27-22.16(o)]</p>	VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and VOC content of each surface coating formulation used and calculated VOC emissions. The daily VOC emissions shall be summed monthly. Tons of VOC emissions per consecutive 12-month period shall be calculated by the sum of the VOC emitted during any one month added to the sum of the VOC emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
7	NOx (Total) <= 2.32 tons/yr based on the permitted annual natural gas usage of primer and main dryer ovens. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
8	CO <= 1.95 tons/yr based on the permitted annual natural gas usage of primer and main dryer ovens. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
9	Ammonia <= 4.92 tons/yr. [N.J.A.C. 7:27-22.16(e)]	<p>Ammonia: Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and ammonium hydroxide content of each surface coating formulation, including any dilutants, shall be used to calculate emissions. The potential ammonia emissions will be calculated using stoichiometry by assuming all the ammonium hydroxide dissociates into ammonia and water.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = Ammonia emissions (lb/day) Q = Material usage rate as applied (lb/day) C = Maximum potential resulting ammonia content from dissociation of ammonium hydroxide (lb Ammonia/lb Coating)</p> <p>For each coating, sum the daily totals for ammonia emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and ammonium hydroxide content of each surface coating formulation used and calculated ammonia emissions. The daily ammonia emissions shall be summed monthly. Tons of ammonia emissions per consecutive 12-month period shall be calculated by the sum of the ammonia emitted during any one month added to the sum of the ammonia emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]</p>	None.
10	Individual HAP emissions shall be below the reporting threshold values specified in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(a)]	<p>Monitored by calculations once initially based on maximum throughput and HAP content of each coating used. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Maintain emission calculation records showing that the PTE for each HAP contained in the coatings used is below the reporting threshold in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(o)]</p>	None.
11	Any person, subject to the recordkeeping provision of N.J.A.C. 7:27-16, shall maintain the required records for a period of no less than five years and shall make those records available upon request of the Department or the EPA, or any duly authorized representative of the Department or the EPA. [N.J.A.C. 7:27-16.22(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U4 Line 4 Water Based Adhesive Surface Coater

Operating Scenario: OS1 Water Based Coating with or without Silicone - Primer

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	VOC Content of Any Surface Coating Formulation as Applied \leq 2.9 lb/gal (minus water) from Table 7B (Paper Coating). [N.J.A.C. 7:27-16.7(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation (minus water) as applied, in pounds of VOC per gallon of coating, the percent by weight of any exempt organic substance and the daily volume of each surface coating applied. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	None.
2	No person shall cause, suffer, allow, or permit the installation of any surface coating or graphic arts operation to apply a surface coating formulation which does not contain water deliberately added in a planned proportion unless a coating application system having a transfer efficiency of 60 percent or greater, or as otherwise approved by the Department, is used. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.
3	VOC Content of Any Surface Coating Formulation as Applied \leq 0.6 % by weight. [N.J.A.C. 7:27-22.16(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C. 7:27-22.16(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation as applied, in pounds of VOC per pound of coating. [N.J.A.C. 7:27-22.16(o)]	None.
4	VOC (Total) \leq 0.63 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	TSP $<$ 0.05 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	Ammonia <= 0.19 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Ammonia: Monitored by calculations per change of material. For each surface coating formulation containing ammonium hydroxide used, the maximum potential lb/hr ammonia emissions shall be calculated based on the permitted coating usage limit and the ammonium hydroxide content of the formulation. The ammonia emissions shall be calculated using stoichiometry by assuming all the ammonium hydroxide is dissociated into ammonia and water. [N.J.A.C. 7:27-22.16(o)]	Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system per change of material. The permittee shall keep a record of all calculations showing the maximum potential ammonia emissions for each coating formulation containing ammonium hydroxide used. [N.J.A.C. 7:27-22.16(o)]	None.
7	Coating Usage <= 105.3 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
8	Coating Usage <= 2,527 lb/day. [N.J.A.C. 7:27-22.16(a)]	Coating Usage: Monitored by material balance daily, based on one calendar day . [N.J.A.C. 7:27-22.16(o)]	Coating Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system daily. Record the quantities of coating utilized, the hours of operation and coating used in pounds per day. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U4 Line 4 Water Based Adhesive Surface Coater

Operating Scenario: OS2 Water Based Coating with or without Silicone - Main

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	VOC Content of Any Surface Coating Formulation as Applied \leq 2.9 lb/gal (minus water) from Table 7B (Paper Coating). [N.J.A.C. 7:27-16.7(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation (minus water) as applied, in pounds of VOC per gallon of coating, the percent by weight of any exempt organic substance and the daily volume of each surface coating applied. [N.J.A.C 7:27-16.7(m)] & [N.J.A.C. 7:27-16.7(o)]	None.
2	VOC Content of Any Surface Coating Formulation as Applied \leq 0.6 % by weight. [N.J.A.C. 7:27-22.16(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C. 7:27-22.16(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation as applied, in pounds of VOC per pound of coating. [N.J.A.C. 7:27-22.16(o)]	None.
3	No person shall cause, suffer, allow, or permit the installation of any surface coating or graphic arts operation to apply a surface coating formulation which does not contain water deliberately added in a planned proportion unless a coating application system having a transfer efficiency of 60 percent or greater, or as otherwise approved by the Department, is used. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.
4	VOC (Total) \leq 5.38 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	TSP $<$ 0.05 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	Ammonia <= 1.26 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Ammonia: Monitored by calculations per change of material. For each surface coating formulation containing ammonium hydroxide used, the maximum potential lb/hr ammonia emissions shall be calculated based on the permitted coating usage limit and the ammonium hydroxide content of the formulation. The ammonia emissions shall be calculated using stoichiometry by assuming all the ammonium hydroxide is dissociated into ammonia and water. [N.J.A.C. 7:27-22.16(o)]	Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system per change of material. The permittee shall keep a record of all calculations showing the maximum potential ammonia emissions for each coating formulation containing ammonium hydroxide used. [N.J.A.C. 7:27-22.16(o)]	None.
7	Coating Usage <= 897 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
8	Coating Usage <= 21,528 lb/day. [N.J.A.C. 7:27-22.16(a)]	Coating Usage: Monitored by material balance daily, based on one calendar day. [N.J.A.C. 7:27-22.16(o)]	Coating Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system daily. Record the quantities of coating utilized, the hours of operation and coating used in pounds per day. [N.J.A.C. 7:27-22.16(o)]	None.

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Facility Specific Requirements**

Emission Unit: U4 Line 4 Water Based Adhesive Surface Coater

Operating Scenario: OS3 Primer Drying Oven (1.65 MM BTU/hr), Uncontrolled Emission, exhausting through emission point PT8.

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Drying oven fuel limited to natural gas only. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
2	NOx (Total) <= 0.16 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
3	CO <= 0.13 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
4	TSP < 0.05 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	Maximum Gross Heat Input <= 1.65 MMBTU/hr (HHV). [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing maximum heat input rate.[N.J.A.C. 7:27-22.16(o)].	None.
6	Natural Gas Usage <= 13.77 MMft ³ per any consecutive 12 month period. Based on 8760 hours per year of operation. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Emission Unit: U4 Line 4 Water Based Adhesive Surface Coater

Operating Scenario: OS4 Main Drying Oven (3.9 MM BTU/hr), Uncontrolled Emission, exhausting through emission point PT9

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Drying oven fuel limited to natural gas only. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
2	NOx (Total) <= 0.37 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
3	CO <= 0.31 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
4	TSP < 0.05 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
5	Maximum Gross Heat Input <= 3.9 MMBTU/hr (HHV). [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing maximum heat input rate.[N.J.A.C. 7:27-22.16(o)].	None.
6	Natural Gas Usage <= 32.54 MMft ³ per any consecutive 12 month period. Based on 8760 hours per year of operation. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Emission Unit: U5 Line 5 Solvent or Water Based Adhesive Surface Coater

Subject Item: CD1 Thermal Oxidizer For Line 5 Solvent Based Adhesive Coating Line

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	VOC Destruction and Removal Efficiency of Ventilation System $\geq 96\%$. The Thermal Oxidizer shall operate at a minimum VOC and HAP destruction and removal efficiency of 96%. [N.J.A.C. 7:27-22.16(a)]	VOC Destruction and Removal Efficiency of Ventilation System: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	VOC Destruction and Removal Efficiency of Ventilation System: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack test requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
2	Design VOC Control Efficiency $\geq 99\%$. The Thermal Oxidizer shall be designed to operate at a minimum VOC and HAP destruction and removal efficiency (DRE) of 99%. [N.J.A.C. 7:27-22.16(e)]	None.	Design VOC Control Efficiency: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Keep records showing design VOC control efficiency for CD1. [N.J.A.C. 7:27-22.16(o)]	None.
3	Minimum Operating Temperature at the Outlet of the Thermal Oxidizer $\geq 1,500$ degrees F (prior to heat recovery). [N.J.A.C. 7:27-22.16(a)]	Minimum Operating Temperature at the Outlet of the Thermal Oxidizer: Monitored by temperature instrument continuously, based on 1 minute intervals. The continuous temperature monitor and recorder shall be equipped with an alarm or other operational warning system. The alarm shall be designed to sound when temperatures less than 1500 degrees F are detected at any time. The monitors and recorders shall be maintained in accordance with manufacturers specifications. The monitors shall be ranged such that the allowable value is approximately mid-scale of the full range current/voltage output. [N.J.A.C. 7:27-22.16(o)]	Minimum Operating Temperature at the Outlet of the Thermal Oxidizer: Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27-22.16(o)]	None.
4	Thermal oxidizer shall be operating at no less than the minimum specified temperature of 1500 degrees F at the outlet of the oxidizer prior to start-up of the source operation. [N.J.A.C. 7:27-22.16(a)]	Monitored by temperature instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. [N.J.A.C. 7:27-22.16(o)]	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	The thermal oxidizer shall not be shut down until all air contaminants have been purged from the air handling system after source shutdown. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
6	Minimum Residence Time ≥ 0.5 seconds for gases in the thermal oxidizer chamber. [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing the design minimum residence time for CD1. [N.J.A.C. 7:27-22.16(o)].	None.
7	Maximum Gross Heat Input ≤ 5.6 MMBTU/hr (HHV) . [N.J.A.C. 7:27-22.16(a)]	None.	Other: Keep records showing the maximum heat input rate. [N.J.A.C. 7:27-22.16(o)].	None.
8	Natural Gas Usage ≤ 30.4 MMft ³ per any consecutive 12-month period. [N.J.A.C. 7:27-22.16(a)]	Natural Gas Usage: Monitored by fuel flow/firing rate instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Natural Gas Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Natural gas usage shall be calculated by the sum of the cubic feet consumed during any month added to the sum of the cubic feet consumed during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.

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Facility Specific Requirements**

Emission Unit: U5 Line 5 Solvent or Water Based Adhesive Surface Coater

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Summary of Applicable Federal Regulations: 40 CFR 60 Subpart A 40 CFR 60 Subpart RR 40 CFR 63 Subpart A 40 CFR 63 Subpart JJJJ [40 CFR Federal Rules Summary]	None.	None.	None.
2	See Subject Item Group GR1 for NSPS Subpart RR Requirement. See Subject Item Group GR2 for NSPS Subpart A and RR Requirements. See Subject Item Group GR3 for MACT Subpart A and JJJJ Requirements. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	<p>STACK TESTING SUMMARY</p> <p>The permittee shall conduct a stack test using a protocol approved by the Department to demonstrate compliance with emission limits from 40 CFR 63 Subpart JJJJ for HAP capture and destruction and removal efficiency as specified in the compliance plan in GR3.</p> <p>Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition.</p> <p>[N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: The initial stack test must be conducted prior to March 20, 2023.</p> <p>[N.J.A.C. 7:27-22.18] and [N.J.A.C. 7:27-22.16(o)].</p>	<p>Other: Recordkeeping as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 within 60 days from the date of the approved BOP200001 operating permit. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and. [N.J.A.C. 7:27-22.18(h)]</p>

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
4	<p>STACK TESTING SUMMARY</p> <p>The permittee shall conduct a stack test within 60 months after the previous performance test demonstrating compliance with 40 CFR 63 Subpart JJJJ using a protocol approved by the Department to demonstrate compliance with emission limits from 40 CFR 63 Subpart JJJJ for HAP destruction and removal efficiency as specified in the compliance plan in GR3. Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition.</p> <p>[N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: Monitoring as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].</p>	<p>Other: Recordkeeping as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 within 48 months after the previous performance test demonstrating compliance with 40 CFR 63 Subpart JJJJ. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and. [N.J.A.C. 7:27-22.18(h)]</p>

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	<p>STACK TESTING SUMMARY</p> <p>The permittee shall conduct a stack test at least 18 months prior to the expiration of the renewed operating permit using an approved protocol to demonstrate compliance with the VOC destruction efficiency for thermal oxidizer CD1 and emission limits for CO, VOC and THC as specified in the compliance plan for operating scenario OS1.</p> <p>Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition. [N.J.A.C. 7:27-22.16(a)]</p>	Other: Monitoring as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].	Other: Recordkeeping as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 at least 30 months prior to the expiration of the approved operating permit. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and . [N.J.A.C. 7:27-22.18(h)]</p>

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	<p>STACK TESTING SCHEDULE FOR EXPIRED PERMIT The permittee shall conduct a stack test no later than 42 months after the date of expiration of the operating permit using an approved protocol to demonstrate compliance with the VOC destruction efficiency for thermal oxidizer CD1 and emission limits for CO, VOC and THC as specified in the compliance plan for operating scenario OS1.</p> <p>Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition. [N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: Monitoring as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].</p>	<p>Other: Recordkeeping as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. If an operating permit has expired, the permittee shall submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 no later than 30 months after the date of expiration of the operating permit. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and [N.J.A.C. 7:27-22.18(h)]</p>

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
7	<p>CEMS/COMS REQUIREMENTS SUMMARY</p> <p>The Permittee shall operate CEMS according to the approved certification and in compliance with daily, quarterly, and annual quality assurance requirements. The CEMS shall include continuous monitoring of all necessary parameters (e.g. oxygen, moisture, temperature, flow rate) to allow the required corrections to be applied to demonstrate compliance with the emission limits.</p> <p>The Permittee shall request approval from the Department's Emission Measurement Section (EMS) to allow continued use of the existing CEMS when a change to the units of measurement is made to a permit limit. [N.J.A.C. 7:27-22.16(a)]</p>	None.	Other: Maintain readily accessible records of the Permittee's written request to EMS, and the response from EMS . [N.J.A.C. 7:27-22.16(o)].	Comply with the requirement: Upon occurrence of event. Submit a written request to the EMS within 30 days from the date of the approved operating permit to determine whether a full CEMS recertification is required, whether the change can follow the procedures for data recording and storage equipment upgrades found in the Department's Technical Manual 1005 Section IV.B.3(f), or if continued use of the existing CEMS is allowed. [N.J.A.C. 7:27-22]
8	The owner or operator shall develop a QA/QC plan for all CEMS/COMS required by this permit prepared in accordance with the NJDEP Technical Manual 1005 posted on the AQPP webpage at http://www.state.nj.us/dep/aqpp . [N.J.A.C. 7:27-22.16(a)]	Other: The QA/QC coordinator shall be responsible for reviewing the QA/QC plan on an annual basis.[N.J.A.C. 7:27-22.16(o)].	Other: Maintain readily accessible records of the QA/QC plan including QA data and quarterly reports.[N.J.A.C. 7:27-22.16(o)].	None.
9	Opacity <= 20 % from each emission point (PT10, 11 and 12), exclusive of visible condensed water vapor, except for a period of not longer than 3 minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-6.2(d)] &. [N.J.A.C. 7:27- 6.2(e)]	None.	None.	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
10	No visible emissions from emission points PT10, 11, and 12; exclusive of condensed water vapor, except for three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-22.16(e)]	<p>Monitored by visual determination each month during operation. Conduct visual inspections during daylight hours to identify if the stack has visible emissions, other than condensed water vapor. Select an observation position enabling clear view of emission point(s), minimum 15 feet away without sunlight shining directly into the eyes. Observe for a minimum duration of 30 minutes. Clock observation with two stopwatches starting the 1st watch at the commencement of the 30-minute observation period and starting and stopping the 2nd watch every time visible emissions are first seen and when they cease, and record the observation. If visible emissions are observed for more than 3 minutes in the 30-consecutive minutes:</p> <p>(1) Verify the equipment and/or control device causing visible emissions is operating according to manufacturer's specifications. If it is not operating properly, take corrective action immediately to eliminate the excess emissions. (2) If the visible emissions problem is not corrected within 24 hours, a certified opacity reader shall perform an opacity observation, in accordance with N.J.A.C. 7:27B-2. Conduct opacity observations, in accordance with N.J.A.C. 7:27B-2, each day until the opacity problem is successfully corrected. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record and retain the following:</p> <p>(1) Date and time of inspection; (2) Emission Point number; (3) Operational status of equipment; (4) Observed results and conclusions; (5) Description of corrective action taken if needed; (6) Date and time opacity problem was solved, if applicable; (7) N.J.A.C. 7:27B-2 results if conducted; and ((8) Name of person(s) conducting inspection. [N.J.A.C. 7:27-22.16(o)]</p>	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	VOC (Total) <= 39.9 tons/yr. [N.J.A.C. 7:27-22.16(a)]	VOC (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis) . [N.J.A.C. 7:27-22.16(o)]	VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and VOC content of each surface coating formulation used and calculated VOC emissions. The daily VOC emissions shall be summed monthly. Tons of VOC emissions per consecutive 12-month period shall be calculated by the sum of the VOC emitted during any one month added to the sum of the VOC emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
12	NOx (Total) <= 7.36 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD1. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
13	CO <= 6.19 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD1. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
14	TSP <= 0.56 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD1. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
15	PM-10 (Total) <= 0.56 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD1. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
16	PM-2.5 (Total) <= 0.56 tons/yr based on PM-10 emission limit. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
17	Ammonia <= 5.52 tons/yr. [N.J.A.C. 7:27-22.16(a)]	<p>Ammonia: Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). The quantity and ammonium hydroxide content of each surface coating formulation, including any dilutants, shall be used to calculate emissions. The potential ammonia emissions will be calculated using stoichiometry by assuming all the ammonium hydroxide dissociates into ammonia and water.</p> <p>For each change of coating:</p> $E = Q \times C$ <p>where: E = Ammonia emissions (lb/day) Q = Material usage rate as applied (lb/day) C = Maximum potential resulting ammonia content from dissociation of ammonium hydroxide (lb Ammonia/lb Coating)</p> <p>For each coating, sum the daily totals for ammonia emissions (lb/day) during each month. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and ammonium hydroxide content of each surface coating formulation used and calculated ammonia emissions. The daily ammonia emissions shall be summed monthly. Tons of ammonia emissions per consecutive 12-month period shall be calculated by the sum of the ammonia emitted during any one month added to the sum of the ammonia emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]</p>	None.
18	Toluene <= 7.3 tons/yr. [N.J.A.C. 7:27-22.16(a)]	<p>Toluene: Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis) . [N.J.A.C. 7:27-22.16(o)]</p>	<p>Toluene: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and toluene content of each surface coating formulation used and calculated toluene emissions. The daily toluene emissions shall be summed monthly. Tons of toluene emissions per consecutive 12-month period shall be calculated by the sum of the toluene emitted during any one month added to the sum of the toluene emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]</p>	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
19	HAPs (Total) <= 7.3 tons/yr. [N.J.A.C. 7:27-22.16(a)]	HAPs (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). [N.J.A.C. 7:27-22.16(o)]	HAPs (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and HAP content of each surface coating formulation used and calculated HAP emissions. The daily HAP emissions shall be summed monthly. Tons of HAP emissions per consecutive 12-month period shall be calculated by the sum of the HAPs emitted during any one month added to the sum of the HAPs emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
20	Individual HAP emissions, excluding toluene, shall be below the reporting threshold values specified in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(a)]	Monitored by calculations once initially based on maximum throughput and HAP content of each coating used. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Maintain emission calculation records showing that the PTE for each HAP other than toluene, contained in the coatings used is below the reporting threshold in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(o)]	None.
21	Maximum Gross Heat Input <= 14 MMBTU/hr (HHV) for drying oven. [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing the maximum heat input rate.[N.J.A.C. 7:27-22.16(o)].	None.
22	Natural Gas Usage <= 116.8 MMft ³ per any consecutive 12-month period for the dryers. [N.J.A.C. 7:27-22.16(e)]	Natural Gas Usage: Monitored by fuel flow/firing rate instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Natural Gas Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Natural gas usage shall be calculated by the sum of the cubic feet consumed during any month added to the sum of the cubic feet consumed during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.

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Facility Specific Requirements**

Emission Unit: U5 Line 5 Solvent or Water Based Adhesive Surface Coater

Operating Scenario: OS1 Solvent Based Coating, 14 MM BTU/hr Drying Ovens, Emissions Controlled by Thermal Oxidizer (CD1), exhausting through PT10

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Particulate Emissions <= 2.87 lb/hr based on 0.02 grains per standard cubic foot of source gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
2	Coating Application System Transfer Efficiency >= 60 %. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.
3	VOC (Total): Maintain records of VOC content in each coating formulation as applied. The Permittee shall maintain records of dates, number of hours and volume of formulations applied, density, any exempt organic substance and water in each formulation; and VOC percent by weight in each formulation. [N.J.A.C. 7:27-16.7(n)1]	Other: Monitored by VOC coating usage as applied. Daily.[N.J.A.C. 7:27-16.17(n)1].	VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system daily. The Permittee shall maintain the following records for each surface coating formulation including each change of diluent or concentration of diluent as applied: i. The number of hours each surface coating formulation was applied and the date; ii. The volume of each surface coating formulation applied; iii. The density of each surface coating formulation; iv. The density of the VOC in each surface coating formulation; v. The percent by weight of VOC in each surface coating formulation; vi. The percent by weight of any exempt organic substance in each surface coating formulation; vii. The percent by weight of any water in each surface coating formulation. [N.J.A.C. 7:27-16.17(n)1]	None.
4	The Permittee shall record on a continuous basis or at a frequency approved in writing by the Department the temperature of the flue gas at the exit of the combustion chamber of the Thermal Oxidizer. [N.J.A.C. 7:27-16.7(n)2]	Monitored by temperature instrument continuously. [N.J.A.C. 7:27-16.7(n)2]	Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27-16.7(n)2]	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	CO: The Permittee shall record the carbon monoxide concentration in the flue gas emitted to the outdoor atmosphere from the Thermal Oxidizer. [N.J.A.C. 7:27-16.7(n)2]	CO: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	CO: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(a)]
6	THC Concentration \leq 94 ppmvd expressed as propane, measured at the thermal oxidizer exhaust, based on stack test results and concurrent CEMS data. [N.J.A.C. 7:27-22.16(a)]	THC Concentration: Monitored by continuous emission monitoring system continuously, based on a 3 hour rolling average based on a 1 hour block average. [N.J.A.C. 7:27-22.16(o)]	THC Concentration: Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27-22.16(o)]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding calendar quarter (the calendar quarters begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal starting with the quarter in which the Performance Specification Test was conducted, for review and approval. Quarterly EEMPR reports shall include all quarterly and annual QA data. This report shall be submitted whether or not an emission exceedance has occurred. See CEMS and QA/QC requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
7	THC Concentration \leq 94 ppmvd expressed as propane, measured at the thermal oxidizer exhaust, based on stack test results and concurrent CEMS data. [N.J.A.C. 7:27-22.16(a)]	THC Concentration: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	THC Concentration: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
8	VOC Destruction and Removal Efficiency of Ventilation System \geq 96 %. The Thermal Oxidizer shall operate at a minimum VOC and HAP destruction and removal efficiency of 96%. [N.J.A.C. 7:27-22.16(a)]	VOC Destruction and Removal Efficiency of Ventilation System: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	VOC Destruction and Removal Efficiency of Ventilation System: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack test requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
9	Design VOC Control Efficiency \geq 99 %. The Thermal Oxidizer shall be designed to operate at a minimum VOC and HAP destruction and removal efficiency (DRE) of 99%. [N.J.A.C. 7:27-22.16(e)]	None.	Design VOC Control Efficiency: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Keep records showing design VOC control efficiency for CD1. [N.J.A.C. 7:27-22.16(o)]	None.
10	VOC Collection and Removal Efficiency of Ventilation System \geq 90 %. [N.J.A.C. 7:27-16.7(c)4i]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	VOC (Total) <= 16.5 lb/hr based on solvent-based coating operations and natural gas combustion in thermal oxidizer and drying ovens. Emission limit based on stack test TST170001. [N.J.A.C. 7:27-22.16(a)]	VOC (Total): Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	VOC (Total): Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
12	NOx (Total) <= 1.86 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
13	CO <= 2.8 lb/hr. [N.J.A.C. 7:27-22.16(a)]	CO: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	CO: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
14	TSP <= 0.14 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
15	PM-10 (Total) <= 0.14 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
16	PM-2.5 (Total) <= 0.14 lb/hr based on PM-10 emission limit. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
17	Toluene <= 11.53 lb/hr. [N.J.A.C. 7:27-22.16(a)]	<p>Toluene: Monitored by calculations at the approved frequency. Calculations shall be performed before the start of operation of the coating line when a coating containing toluene is used. Calculations shall be made using the following equation:</p> $T = (C_m * Q_m) + (C_r * Q_r) * (L / L_{max}) * (1 - DRE)$ <p>where T is the toluene emission rate in lb/hr, C_m is the toluene content of the main coating, Q_m is the maximum permitted coating usage for main coating in lb/hr, C_r is the toluene content of the release coating, Q_r is the maximum permitted coating usage for release coating in lb/hr, L is the line speed for the coating used in ft/min, L_{max} is the maximum line speed capability of the coating line (150 ft/min) and DRE is the permitted destruction and removal efficiency of the control device.</p> <p>If operating the coating line at the maximum speed (150 ft/min) would cause toluene emissions for a coating to exceed the toluene limit, the maximum coating line speed for the coating to meet the limit shall be calculated and the coating line speed shall be recorded each hour during operation when that coating is used. [N.J.A.C. 7:27-22.16(o)]</p>	Toluene: Recordkeeping by manual logging of parameter or storing data in a computer data system at the approved frequency. The permittee shall keep records of the required calculations, the toluene content of each coating used and the maximum coating line speed for each coating used. The permittee shall record the coating line speed and time of day each hour during operation when a coating is used that requires a coating line speed below the maximum capability of the coating line to meet the toluene emission limit. [N.J.A.C. 7:27-22.16(o)]	None.
18	Capture efficiency of the source emissions from non-complying coatings (including fugitive emissions) shall be 100 percent. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
19	All VOC emissions from solvent-based coatings shall be directed to the regenerative thermal oxidizer (CD1). Daily production records shall indicate the type of coating being applied on the coater. The position of the damper shall allow exhaust to the RTO when solvent-based coatings are being applied. [N.J.A.C. 7:27-22.16(a)]	Other: Monitored by daily observations of the type of coating being applied on the coater. During solvent-based coating operations, the damper position shall be either monitored continuously with a direct signal indicating the damper to the thermal oxidizer is open or monitored once per shift with a visual observation of damper position.[N.J.A.C. 7:27-22.16(o)].	Other: The type of coating applied shall be recorded each day during operation. During solvent-based coating operations, the damper position shall either be recorded continuously with a data acquisition system, or recorded once per shift with a manual written log. For each occurrence of improper damper position during solvent-based coating operations, the corrective action taken shall be recorded.[N.J.A.C. 7:27-22.16(o)].	None.
20	Coating Usage <= 550 lb/hr The main coating usage shall be <= 516.6 lb/hr and the release coating usage shall be <= 33.3 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U5 Line 5 Solvent or Water Based Adhesive Surface Coater

Operating Scenario: OS2 Water Based Coating with 14 MM BTU/hr Drying Ovens, Uncontrolled Emissions, exhausting through PT11 and PT12

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Particulate Emissions <= 3.44 lb/hr for emission points PT11 & PT12 (27,000 acfm) based on 0.02 grains per standard cubic foot of source gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
2	VOC Content of Any Surface Coating Formulation as Applied <= 2.9 lb/gal (minus water) from Table 7B (Paper Coating). [N.J.A.C. 7:27-16.7(a)]	VOC Content of Any Surface Coating Formulation as Applied: Monitored by formulation data once initially and per change of material. The permittee shall document that each coating is VOC compliant utilizing standard formulation sheets, MSDS forms or the results of analytical tests. [N.J.A.C 7:27-16.7(m)] &. [N.J.A.C. 7:27-16.7(o)]	VOC Content of Any Surface Coating Formulation as Applied: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and per change of material. The permittee shall maintain records of the VOC content of each surface coating formulation (minus water) as applied, in pounds of VOC per gallon of coating, the percent by weight of any exempt organic substance and the daily volume of each surface coating applied. [N.J.A.C 7:27-16.7(m)] &. [N.J.A.C. 7:27-16.7(o)]	None.
3	No person shall cause, suffer, allow, or permit the installation of any surface coating or graphic arts operation to apply a surface coating formulation which does not contain water deliberately added in a planned proportion unless a coating application system having a transfer efficiency of 60 percent or greater, or as otherwise approved by the Department, is used. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.
4	VOC (Total) < 0.05 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	NOx (Total) <= 1.33 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
6	CO <= 1.12 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
7	TSP <= 0.1 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
8	PM-10 (Total) <= 0.1 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
9	PM-2.5 (Total) <= 0.1 lb/hr based on PM-10 emission limit. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
10	Ammonia <= 1.26 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Ammonia: Monitored by calculations per change of material. For each surface coating formulation containing ammonium hydroxide used, the maximum potential lb/hr ammonia emissions shall be calculated based on the permitted coating usage limit and the ammonium hydroxide content of the formulation. The ammonia emissions shall be calculated using stoichiometry by assuming all the ammonium hydroxide is dissociated into ammonia and water. [N.J.A.C. 7:27-22.16(o)]	Ammonia: Recordkeeping by manual logging of parameter or storing data in a computer data system per change of material. The permittee shall keep a record of all calculations showing the maximum potential ammonia emissions for each coating formulation containing ammonium hydroxide used. [N.J.A.C. 7:27-22.16(o)]	None.
11	Hours of Operation <= 5,730 hours per each consecutive 12 month period, for water-based coating operations. [N.J.A.C. 7:27-22.16(e)]	Hours of Operation: Monitored by hour/time monitor upon occurrence of event. [N.J.A.C. 7:27-22.16(o)]	Hours of Operation: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Keep records showing the hours of operation for each month and each consecutive 12 month period. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U8 Line 8 Solvent Based Adhesive Surface Coater

Subject Item: CD2 Thermal Oxidizer For Line 8 Solvent Based Adhesive Coating Line

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	VOC Destruction and Removal Efficiency of Ventilation System $\geq 98\%$. The Thermal Oxidizer shall operate at a minimum VOC and HAP destruction and removal efficiency of 98%. [N.J.A.C. 7:27-22.16(e)]	VOC Destruction and Removal Efficiency of Ventilation System: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	VOC Destruction and Removal Efficiency of Ventilation System: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack test requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
2	Design VOC Control Efficiency $\geq 99\%$. The Thermal Oxidizer shall be designed to operate at a minimum VOC and HAP destruction and removal efficiency (DRE) of 99%. [N.J.A.C. 7:27-22.16(e)]	None.	Design VOC Control Efficiency: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Keep records showing design VOC control efficiency for CD2. [N.J.A.C. 7:27-22.16(o)]	None.
3	Minimum Operating Temperature at the Exit of the Combustion Section $\geq 1,525$ degrees F (prior to heat recovery). [N.J.A.C. 7:27-22.16(a)]	Minimum Operating Temperature at the Exit of the Combustion Section: Monitored by temperature instrument continuously, based on 1 minute intervals. The continuous temperature monitor and recorder shall be equipped with an alarm or other operational warning system. The alarm shall be designed to sound when temperatures less than 1500 degrees F are detected at any time. The monitors and recorders shall be maintained in accordance with manufacturers specifications. The monitors shall be ranged such that the allowable value is approximately mid-scale of the full range current/voltage output. [N.J.A.C. 7:27-22.16(o)]	Minimum Operating Temperature at the Exit of the Combustion Section: Recordkeeping by strip chart, round chart or data acquisition (DAS) system / electronic data storage continuously. [N.J.A.C. 7:27-22.16(o)]	None.
4	Minimum Residence Time ≥ 1 seconds for gases in the thermal oxidizer chamber. [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing the design minimum residence time for CD2. [N.J.A.C. 7:27-22.16(o)].	None.
5	Maximum Gross Heat Input ≤ 9 MMBTU/hr (HHV) (2 burners combined, each burner ≤ 4.5 MMBtu/hr). [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing the maximum heat input rate. [N.J.A.C. 7:27-22.16(o)].	None.

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Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	Natural Gas Usage \leq 53.14 MMft ³ per any consecutive 12 month period. [N.J.A.C. 7:27-22.16(a)]	Natural Gas Usage: Monitored by fuel flow/firing rate instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Natural Gas Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Natural gas usage per consecutive 12-month period shall be calculated by the sum of the cubic feet consumed during any month added to the sum of the cubic feet consumed during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
7	Thermal Oxidizer shall be operating at no less than the minimum specified temperature of 1,525 degrees F at the outlet of the oxidizer prior to start-up of the source operation. [N.J.A.C. 7:27-22.16(a)]	Monitored by temperature instrument continuously . [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. [N.J.A.C. 7:27-22.16(o)]	None.
8	The Thermal Oxidizer shall not be shut down until all air contaminants have been purged from the air handling system after source shutdown. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Emission Unit: U8 Line 8 Solvent Based Adhesive Surface Coater**Operating Scenario:** OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Summary of Applicable Federal Regulations: 40 CFR 60 Subpart A 40 CFR 60 Subpart RR 40 CFR 63 Subpart A 40 CFR 63 Subpart JJJJ [40 CFR Federal Rules Summary]	None.	None.	None.
2	See Subject Item Group GR1 for NSPS Subpart RR Requirement. See Subject Item Group GR2 for NSPS Subpart A and RR Requirements. See Subject Item Group GR3 for MACT Subpart A and JJJJ Requirements. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	<p>STACK TESTING SUMMARY</p> <p>The permittee shall conduct a stack test using a protocol approved by the Department to demonstrate compliance with emission limits from 40 CFR 63 Subpart JJJJ for HAP capture and destruction and removal efficiency as specified in the compliance plan in GR3.</p> <p>Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition.</p> <p>[N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: The initial stack test must be conducted prior to March 20, 2023.</p> <p>[N.J.A.C. 7:27-22.18] and [N.J.A.C. 7:27-22.16(o)].</p>	<p>Other: Recordkeeping as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 within 60 days from the date of the approved BOP200001 operating permit. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and. [N.J.A.C. 7:27-22.18(h)]</p>

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
4	<p>STACK TESTING SUMMARY</p> <p>The permittee shall conduct a stack test within 60 months after the previous performance test demonstrating compliance with 40 CFR 63 Subpart JJJJ using a protocol approved by the Department to demonstrate compliance with emission limits from 40 CFR 63 Subpart JJJJ for HAP destruction and removal efficiency as specified in the compliance plan in GR3. Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition.</p> <p>[N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: Monitoring as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].</p>	<p>Other: Recordkeeping as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 within 48 months after the previous performance test demonstrating compliance with 40 CFR 63 Subpart JJJJ. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and. [N.J.A.C. 7:27-22.18(h)]</p>

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	<p>STACK TESTING SUMMARY</p> <p>The permittee shall conduct a stack test at least 18 months prior to the expiration of the renewed operating permit using an approved protocol to demonstrate compliance with the VOC destruction efficiency for thermal oxidizer CD2 and emission limits for CO, VOC and THC as specified in the compliance plan for operating scenario OS1.</p> <p>Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition. [N.J.A.C. 7:27-22.16(a)]</p>	Other: Monitoring as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].	Other: Recordkeeping as required under the applicable operating scenario(s).[N.J.A.C. 7:27-22.16(o)].	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 at least 30 months prior to the expiration of the approved operating permit. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and . [N.J.A.C. 7:27-22.18(h)]</p>

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
6	<p>STACK TESTING SCHEDULE FOR EXPIRED PERMIT The permittee shall conduct a stack test no later than 42 months after the date of expiration of the operating permit using an approved protocol to demonstrate compliance with the VOC destruction efficiency for thermal oxidizer CD2 and emission limits for CO, VOC and THC as specified in the compliance plan for operating scenario OS1.</p> <p>Testing must be conducted at worst-case permitted operating conditions with regard to meeting the applicable emission standards, but without creating an unsafe condition. [N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: Monitoring as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].</p>	<p>Other: Recordkeeping as required under the applicable operating scenario(s). [N.J.A.C. 7:27-22.16(o)].</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. If an operating permit has expired, the permittee shall submit a stack test protocol to the Emission Measurement Section (EMS) at Mail Code: 09-01, PO Box 420, Trenton, NJ 08625 no later than 30 months after the date of expiration of the operating permit. The protocol and test report must be prepared and submitted on a CD using the Electronic Reporting Tool (ERT), unless another format is approved by EMS. The ERT program can be downloaded at: https://www.epa.gov/chief. Within 30 days of protocol approval or no less than 60 days prior to the testing deadline, whichever is later, the permittee must contact EMS at 609-984-3443 to schedule a mutually acceptable test date.</p> <p>A full stack test report must be submitted to EMS and a certified summary test report must be submitted to the Regional Enforcement Office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] and [N.J.A.C. 7:27-22.18(h)]</p>

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
7	<p>CEMS/COMS REQUIREMENTS SUMMARY</p> <p>The Permittee shall operate CEMS according to the approved certification and in compliance with daily, quarterly, and annual quality assurance requirements. The CEMS shall include continuous monitoring of all necessary parameters (e.g. oxygen, moisture, temperature, flow rate) to allow the required corrections to be applied to demonstrate compliance with the emission limits.</p> <p>The Permittee shall request approval from the Department's Emission Measurement Section (EMS) to allow continued use of the existing CEMS when a change to the units of measurement is made to a permit limit. [N.J.A.C. 7:27-22.16(a)]</p>	None.	Other: Maintain readily accessible records of the Permittee's written request to EMS, and the response from EMS . [N.J.A.C. 7:27-22.16(o)].	Comply with the requirement: Upon occurrence of event. Submit a written request to the EMS within 30 days from the date of the approved operating permit to determine whether a full CEMS recertification is required, whether the change can follow the procedures for data recording and storage equipment upgrades found in the Department's Technical Manual 1005 Section IV.B.3(f), or if continued use of the existing CEMS is allowed. [N.J.A.C. 7:27-22]
8	The owner or operator shall develop a QA/QC plan for all CEMS/COMS required by this permit prepared in accordance with the NJDEP Technical Manual 1005 posted on the AQPP webpage at http://www.state.nj.us/dep/aqpp . [N.J.A.C. 7:27-22.16(a)]	Other: The QA/QC coordinator shall be responsible for reviewing the QA/QC plan on an annual basis.[N.J.A.C. 7:27-22.16(o)].	Other: Maintain readily accessible records of the QA/QC plan including QA data and quarterly reports.[N.J.A.C. 7:27-22.16(o)].	None.
9	Particulate Emissions <= 3.56 lb/hr for emission point PT13 (50,000 acfm) based on 0.02 grains per standard cubic foot of source gas emitted from source operation. [N.J.A.C. 7:27- 6.2(a)]	None.	None.	None.
10	Opacity <= 20 % from emission point PT13, exclusive of condensed water vapor, except for a period of 3 minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-6.2(d)] & . [N.J.A.C. 7:27- 6.2(e)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	No visible emissions from emission point PT13, exclusive of visible water vapor, except for three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-22.16(e)]	Monitored by visual determination each month during operation. Conduct visual inspections during daylight hours to identify if the stack has visible emissions, other than condensed water vapor. Select an observation position enabling clear view of emission point(s), minimum 15 feet away without sunlight shining directly into the eyes. Observe for a minimum duration of 30 minutes. Clock observation with two stopwatches starting the 1st watch at the commencement of the 30-minute observation period and starting and stopping the 2nd watch every time visible emissions are first seen and when they cease, and record the observation. If visible emissions are observed for more than 3 minutes in the 30-consecutive minutes: (1) Verify the equipment and/or control device causing visible emissions is operating according to manufacturer's specifications. If it is not operating properly, take corrective action immediately to eliminate the excess emissions. (2) If the visible emissions problem is not corrected within 24 hours, a certified opacity reader shall perform an opacity observation, in accordance with N.J.A.C. 7:27B-2. Conduct opacity observations, in accordance with N.J.A.C. 7:27B-2, each day until the opacity problem is successfully corrected. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record and retain the following: (1) Date and time of inspection; (2) Emission Point number; (3) Operational status of equipment; (4) Observed results and conclusions; (5) Description of corrective action taken if needed; (6) Date and time opacity problem was solved, if applicable; (7) N.J.A.C. 7:27B-2 results if conducted; and (8) Name of person(s) conducting inspection. [N.J.A.C. 7:27-22.16(o)]	None.
12	Coating Application System Transfer Efficiency \geq 60 %. [N.J.A.C. 7:27-16.7(d)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
13	VOC (Total): Maintain records of VOC content in each coating formulation as applied. The Permittee shall maintain records of dates, number of hours and volume of formulations applied, density, any exempt organic substance and water in each formulation; and VOC percent by weight in each formulation. [N.J.A.C. 7:27-16.7(n)1]	Other: Monitored by VOC coating usage as applied. Daily.[N.J.A.C. 7:27-16.7(n)1].	VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system daily. The Permittee shall maintain the following records for each surface coating formulation including each change of diluent or concentration of diluent as applied: i. The number of hours each surface coating formulation was applied and the date; ii. The volume of each surface coating formulation applied; iii. The density of each surface coating formulation; iv. The density of the VOC in each surface coating formulation; v. The percent by weight of VOC in each surface coating formulation; vi. The percent by weight of any exempt organic substance in each surface coating formulation; vii. The percent by weight of any water in each surface coating formulation. [N.J.A.C. 7:27-16.7(n)1]	None.
14	The Permittee shall record on a continuous basis or at a frequency approved in writing by the Department the temperature of the flue gas at the exit of the combustion chamber of the Thermal Oxidizer. [N.J.A.C. 7:27-16.7(n)2]	Monitored by temperature instrument continuously. [N.J.A.C. 7:27-16.7(n)2]	Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27-16.7(n)2]	None.
15	CO: The Permittee shall record the carbon monoxide concentration in the flue gas emitted to the outdoor atmosphere from the Thermal Oxidizer. [N.J.A.C. 7:27-16.7(n)2]	CO: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	CO: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack test requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
16	VOC Collection and Removal Efficiency of Ventilation System \geq 90 %. [N.J.A.C. 7:27-16.17(q)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
17	VOC (Total) <= 90 tons/yr. [N.J.A.C. 7:27-22.16(a)]	VOC (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). [N.J.A.C. 7:27-22.16(o)]	VOC (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and VOC content of each surface coating formulation used and calculated VOC emissions. The daily VOC emissions shall be summed monthly. Tons of VOC emissions per consecutive 12-month period shall be calculated by the sum of the VOC emitted during any one month added to the sum of the VOC emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
18	NOx (Total) <= 4.32 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD2. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
19	CO <= 3.62 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD2. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
20	TSP <= 0.33 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD2. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
21	PM-10 (Total) <= 0.33 tons/yr based on the permitted annual natural gas usage of dryer ovens and CD2. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
22	PM-2.5 (Total) <= 0.33 tons/yr based on PM-10 emission limit. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
23	Toluene <= 29.2 tons/yr. [N.J.A.C. 7:27-22.16(a)]	Toluene: Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). [N.J.A.C. 7:27-22.16(o)]	Toluene: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Record the quantity and toluene content of each surface coating formulation used and calculated toluene emissions. The daily toluene emissions shall be summed monthly. Tons of toluene emissions per consecutive 12-month period shall be calculated by the sum of the toluene emitted during any one month added to the sum of the toluene emitted during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.
24	HAPs (Total) <= 29.2 tons/yr. [N.J.A.C. 7:27-22.16(a)]	HAPs (Total): Monitored by calculations each month during operation, based on a consecutive 12 month period (rolling 1 month basis). [N.J.A.C. 7:27-22.16(o)]	HAPs (Total): Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation of the calculated emissions. [N.J.A.C. 7:27-22.16(o)]	None.
25	Individual HAP emissions, excluding toluene, shall be below the reporting threshold values specified in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(a)]	Monitored by calculations once initially based on maximum throughput and HAP content of each coating used. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Maintain emission calculation records showing that the PTE for each HAP other than toluene, contained in the coatings used is below the reporting threshold in N.J.A.C. 7:27-17. [N.J.A.C. 7:27-22.16(o)]	None.
26	VOC capture efficiency shall be no less than 100% for all equipment venting to the thermal oxidizer. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
27	Coating Usage <= 1,165 lb/hr The main coating usage shall be <= 1100 lb/hr and the release coating usage shall be <= 65 lb/hr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
28	The Thermal Oxidizer shall not be shut down until all air contaminants have been purged from the air handling system after source shutdown. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
29	Maximum gross heat input to dryers <= 5.61 MM Btu/hr (total for 5 drying zones). [N.J.A.C. 7:27-22.16(e)]	None.	Other: Keep records showing the maximum heat input rate.[N.J.A.C. 7:27-22.16(o)].	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
30	Natural Gas Usage ≤ 33.13 MMft ³ /yr for drying oven. [N.J.A.C. 7:27-22.16(e)]	Natural Gas Usage: Monitored by fuel flow/firing rate instrument continuously. [N.J.A.C. 7:27-22.16(o)]	Natural Gas Usage: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. Natural gas usage per consecutive 12-month period shall be calculated by the sum of the cubic feet consumed during any month added to the sum of the cubic feet consumed during the preceding 11 months. [N.J.A.C. 7:27-22.16(o)]	None.

BOP200001

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U8 Line 8 Solvent Based Adhesive Surface Coater

Operating Scenario: OS1 Solvent Based Coating, Emissions Controlled by a Regenerative Thermal Oxidizer (CD2), exhausting through PT13

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	THC Concentration \leq 36 ppmvd expressed as propane, measured at the thermal oxidizer exhaust. [N.J.A.C. 7:27-22.16(e)]	THC Concentration: Monitored by continuous emission monitoring system continuously, based on a 3 hour rolling average based on a 1 hour block average. [N.J.A.C. 7:27-22.16(o)]	THC Concentration: Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27-22.16(o)]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding calendar quarter (the calendar quarters begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal starting with the quarter in which the Performance Specification Test was conducted, for review and approval. Quarterly EEMPR reports shall include all quarterly and annual QA data. This report shall be submitted whether or not an emission exceedance has occurred. See CEMS and QA/QC requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
2	THC Concentration \leq 36 ppmvd expressed as propane, measured at the thermal oxidizer exhaust. [N.J.A.C. 7:27-22.16(a)]	THC Concentration: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	THC Concentration: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
3	VOC Destruction and Removal Efficiency of Ventilation System \geq 98 %. The Thermal Oxidizer shall operate at a minimum VOC and HAP destruction and removal efficiency of 98%. [N.J.A.C. 7:27-22.16(e)]	VOC Destruction and Removal Efficiency of Ventilation System: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	VOC Destruction and Removal Efficiency of Ventilation System: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack test requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
4	Design VOC Control Efficiency \geq 99 %. The Thermal Oxidizer shall be designed to operate at a minimum VOC and HAP destruction and removal efficiency (DRE) of 99%. [N.J.A.C. 7:27-22.16(e)]	None.	Design VOC Control Efficiency: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. Keep records showing design VOC control efficiency for CD2. [N.J.A.C. 7:27-22.16(o)]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	VOC (Total) <= 34.87 lb/hr. [N.J.A.C. 7:27-22.16(e)]	VOC (Total): Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	VOC (Total): Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack test requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
6	NOx (Total) <= 1.39 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
7	CO <= 1.23 lb/hr. [N.J.A.C. 7:27-22.16(a)]	CO: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	CO: Recordkeeping by stack test results prior to permit expiration date. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack test requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]
8	TSP <= 0.11 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
9	PM-10 (Total) <= 0.11 lb/hr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
10	PM-2.5 (Total) <= 0.11 lb/hr based on PM-10 emission limit. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	Toluene <= 10.45 lb/hr. [N.J.A.C. 7:27-22.16(e)]	<p>Toluene: Monitored by calculations at the approved frequency. Calculations shall be performed before the start of operation of the coating line when a coating containing toluene is used. Calculations shall be made using the following equation:</p> $T = (C_m * Q_m) + (C_r * Q_r) * (L / L_{max}) * (1 - DRE)$ <p>where T is the toluene emission rate in lb/hr, C_m is the toluene content of the main coating, Q_m is the maximum permitted coating usage for main coating in lb/hr, C_r is the toluene content of the release coating, Q_r is the maximum permitted coating usage for release coating in lb/hr, L is the line speed for the coating used in ft/min, L_{max} is the maximum line speed capability of the coating line (220 ft/min) and DRE is the permitted destruction and removal efficiency of the control device.</p> <p>If operating the coating line at the maximum speed (220 ft/min) would cause toluene emissions for a coating to exceed the toluene limit, the maximum coating line speed for the coating to meet the limit shall be calculated and the coating line speed shall be recorded each hour during operation when that coating is used. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Toluene: Recordkeeping by manual logging of parameter or storing data in a computer data system at the approved frequency. The permittee shall keep records of the required calculations, the toluene content of each coating used and the maximum coating line speed for each coating used. The permittee shall record the coating line speed and time of day each hour during operation when a coating is used that requires a coating line speed below the maximum capability of the coating line to meet the toluene emission limit. [N.J.A.C. 7:27-22.16(o)]</p>	None.

AMERICAN BILTRITE INC (46046)
BOP200001

Date: 6/3/2022

New Jersey Department of Environmental Protection
Facility Profile (General)

Facility Name (AIMS): American Biltrite Incorporated

Facility ID (AIMS): 46046

Street 105 WHITTENDALE DR
Address: MOORESTOWN, NJ 08057

Mailing 105 WHITTENDALE DR
Address: MOORESTOWN, NJ 08057

County: Burlington
Location Industrial Park
Description:

State Plane Coordinates:

X-Coordinate: 75

Y-Coordinate: 40

Units: Long/Lat

Datum:

Source Org.:

Source Type:

Industry:

Primary SIC: 2672

Secondary SIC:

NAICS: 322220

New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: Air Permit Information Contact

Organization: American Biltrite Incorporated

Org. Type: Corporation

Name: Rebecca Apistar

NJ EIN: 00041701350

Title: Compliance Manager

Phone: (856) 813-8814 x

Mailing Address: 105 Whittendale Drive
Moorestown, NJ 08057

Fax: () - x

Other: () - x

Type:

Email: apistar@abitape.com

Contact Type: Consultant

Organization: Compliance Management International

Org. Type: Private

Name: Chris Maye

NJ EIN:

Title: Env Consultant

Phone: (215) 699-4800 x

Mailing Address: 1350 Welsh Road
Suite 200
North Wales, PA 19454

Fax: (215) 699-8315 x

Other: (215) 692-3385 x

Type: Mobile

Email: cmaye@complianceplace.com

Contact Type: Emission Statements

Organization: American Biltrite Incorporated

Org. Type: Corporation

Name: Rebecca Apistar

NJ EIN: 00041701350

Title: Compliance Manager

Phone: (856) 813-8814 x

Mailing Address: 105 Whittendale Drive
Moorestown, NJ 08057

Fax: () - x

Other: () - x

Type:

Email: apistar@abitape.com

New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: Fees/Billing Contact

Organization: American Biltrite Incorporated

Org. Type: Corporation

Name: Rebecca Apistar

NJ EIN: 00041701350

Title: Compliance Manager

Phone: (856) 813-8814 x

Mailing Address: 105 Whittendale Drive
Moorestown, NJ 08057

Fax: () - x

Other: () - x

Type:

Email: apistar@abitape.com

Contact Type: On-Site Manager

Organization: American Biltrite Incorporated

Org. Type: Corporation

Name: Joe Derr

NJ EIN: 00041701350

Title: Plant Manager

Phone: (856) 813-8924 x

Mailing Address: 105 Whittendale Drive
Moorestown, NJ 08057

Fax: (856) 231-9477 x

Other: () - x

Type:

Email: derr@abitape.com

Contact Type: Operator

Organization: American Biltrite Inc.

Org. Type: Corporation

Name: American Biltrite Inc.

NJ EIN:

Title:

Phone: (781) 237-6655 x

Mailing Address: 57 River Street
Wellesley, MA 02481

Fax: () - x

Other: () - x

Type:

Email:

New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: Owner (Current Primary)

Organization: American Biltrite Inc.

Org. Type: Corporation

Name: American Biltrite Inc.

NJ EIN:

Title:

Phone: (781) 237-6655 x

Mailing Address: 57 River Street

Fax: () - x

Wellesley, MA 02481

Other: () - x

Type:

Email:

Contact Type: Responsible Official

Organization: American Biltrite Incorporated

Org. Type: Corporation

Name: Joe Derr

NJ EIN: 00041701350

Title: Plant Manager

Phone: (856) 813-8924 x

Mailing Address: 105 Whittendale Drive

Fax: (856) 778-5787 x

Moorestown, NJ 08057

Other: () - x

Type:

Email: derr@abitape.com

Contact Type: Title V Compliance Certification Contact

Organization: American Biltrite Incorporated

Org. Type: Corporation

Name: Joe Derr

NJ EIN: 00041701350

Title: Plant Manager

Phone: (856) 813-8924 x

Mailing Address: 105 Whittendale Drive

Fax: (856) 778-5787 x

Moorestown, NJ 08057

Other: () - x

Type:

Email: derr@abitape.com

AMERICAN BILTRITE INC (46046)
BOP200001

Date: 6/3/2022

New Jersey Department of Environmental Protection
Insignificant Source Emissions

IS NJID	Source/Group Description	Equipment Type	Location Description	Estimate of Emissions (tpy)								
				VOC (Total)	NOx	CO	SO	TSP	PM-10	Pb	HAPS (Total)	Other (Total)
IS1	44 Direct-Fired Space Heaters, less than 1 MM BTU/hr, burning natural gas	Fuel Combustion Equipment (Other)	Production Building	0.013	0.240	0.048	0.001	0.007	0.007	0.000	0.00000000	0.000
Total				0.013	0.240	0.048	0.001	0.007	0.007	0.000	0.00000000	0.000

BOP200001

**New Jersey Department of Environmental Protection
Equipment Inventory**

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand- Fathered	Last Mod. (Since 1968)	Equip. Set ID
E1	C001	Line 1 Water Based Adhesive Surface Coater	Surface Coating Equipment (Non-Fabric Material)	PCP960003	3/1/1989	No	7/17/1995	
E2	C002	Line 2 Water Based Adhesive Surface Coater	Surface Coating Equipment (Non-Fabric Material)	PCP960001	3/1/1989	No	7/17/1995	
E3	C003	Line 3 Water Based Adhesive Surface Coater	Surface Coating Equipment (Non-Fabric Material)	PCP960004	12/1/1992	No		
E4	C004	Line 4 Water Based Adhesive Coater - Primer	Surface Coating Equipment (Non-Fabric Material)	PCP960005	10/1/1996	No		
E5	C005	Line 5 Solvent or Water Based Adhesive Surface Coater	Surface Coating Equipment (Non-Fabric Material)	PCP970001	3/1/1996	No		
E6	C011	Line 1 Drying Oven	Surface Coating Dryer	PCP960003	3/1/1989	No	7/17/1995	
E7	C022	Line 2 Drying Oven	Surface Coating Dryer	PCP960001	3/1/1989	No	7/17/1995	
E8	C044	Line 4 Water Based Adhesive Coater - Main	Surface Coating Equipment (Non-Fabric Material)	PCP960005	10/1/1994	No	10/1/1996	
E9		Line 8 Solvent Based Adhesive Surface Coater	Surface Coating Equipment (Non-Fabric Material)	PCP010001	11/7/2001	No		
E12		Line 3 Drying Oven	Surface Coating Dryer	PCP960004	12/1/1992	No		
E13		Line 4 Drying Oven - Primer	Surface Coating Dryer	PCP960005	10/1/1996	No		

AMERICAN BILTRITE INC (46046)

Date: 6/3/2022

BOP200001

**New Jersey Department of Environmental Protection
Equipment Inventory**

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand- Fathered	Last Mod. (Since 1968)	Equip. Set ID
E14		Line 4 Drying Oven - Main	Surface Coating Dryer	PCP960005	10/1/1994	No		

46046 AMERICAN BILTRITE INC BOP200001 E1 (Surface Coating Equipment (Non-Fabric Material))
Print Date: 9/3/2021

Make:		
Manufacturer:	Lembo	
Model:		
Method of Application:	Other ▼	Spray Type: ▼
Description:	Maier Rod Coater	
Have you attached a diagram showing the location and/or the configuration of this equipment?	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	
<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Comments:	Web Fed Coater with Dryer	

46046 AMERICAN BILTRITE INC BOP200001 E2 (Surface Coating Equipment (Non-Fabric Material))
Print Date: 9/3/2021

Make:		
Manufacturer:	J-R Green	
Model:		
Method of Application:	Other ▼	Spray Type: ▼
Description:	Maier Rod Coater	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? <input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	Web Fed Coater with Dryer	

46046 AMERICAN BILTRITE INC BOP200001 E3 (Surface Coating Equipment (Non-Fabric Material))
Print Date: 9/3/2021

Make:		
Manufacturer:	ASI	
Model:		
Method of Application:	Other ▼	Spray Type: ▼
Description:	Maier Rod Coater	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? <input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	Web Fed Coater with Dryer	

46046 AMERICAN BILTRITE INC BOP200001 E4 (Surface Coating Equipment (Non-Fabric Material))
Print Date: 9/3/2021

Make:		
Manufacturer:	Black Clawson	
Model:		
Method of Application:	Other ▼	Spray Type: ▼
Description:	Maier Rod Coater	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? <input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	Web Fed Coater with Dryer	

46046 AMERICAN BILTRITE INC BOP200001 E5 (Surface Coating Equipment (Non-Fabric Material))
Print Date: 9/3/2021

Make:		
Manufacturer:	Wolverine	
Model:		
Method of Application:	Other ▼	Spray Type: ▼
Description:	Gravure Roller	
Have you attached a diagram showing the location and/or the configuration of this equipment?	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	
<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Comments:	Web Fed Coater with Dryer	

46046 AMERICAN BILTRITE INC BOP200001 E6 (Surface Coating Dryer)
Print Date: 9/3/2021

Make:	<input type="text"/>		
Manufacturer:	<input type="text"/>		
Model:	<input type="text"/>		
Dryer Type:	<input type="text"/>		
Heating Method:	<input type="text"/>		
Maximum Rated Gross Heat Input (MMBtu/hr):	<input type="text" value="3.90"/>		
Maximum % Sulfur content in Fuel:	<input type="text"/>		
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	<input type="text" value="Fired with natural gas only"/>		

46046 AMERICAN BILTRITE INC BOP200001 E7 (Surface Coating Dryer)
Print Date: 9/3/2021

Make:	<input type="text"/>	
Manufacturer:	<input type="text"/>	
Model:	<input type="text"/>	
Dryer Type:	<input type="text"/>	
Heating Method:	<input type="text"/>	
Maximum Rated Gross Heat Input (MMBtu/hr):	<input type="text" value="4.20"/>	
Maximum % Sulfur content in Fuel:	<input type="text"/>	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? <input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	<input type="text" value="Fired with natural gas only"/>	

46046 AMERICAN BILTRITE INC BOP200001 E8 (Surface Coating Equipment (Non-Fabric Material))
Print Date: 9/3/2021

Make:		
Manufacturer:	Black Clawson	
Model:		
Method of Application:	Other ▼	Spray Type: ▼
Description:	Maier Rod Coater	
Have you attached a diagram showing the location and/or the configuration of this equipment?	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	
<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Comments:	Web Fed Coater with Dryer	

46046 AMERICAN BILTRITE INC BOP200001 E9 (Surface Coating Equipment (Non-Fabric Material))
Print Date: 9/3/2021

Make:	Custom Designed	
Manufacturer:	Converting Concepts Corporation	
Model:	Custom Designed	
Method of Application:	Other ▼	Spray Type: ▼
Description:	Gravure Roller	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? <input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	Web Fed Coater with Dryer	

46046 AMERICAN BILTRITE INC BOP200001 E12 (Surface Coating Dryer)
Print Date: 9/3/2021

Make:	<input type="text"/>		
Manufacturer:	<input type="text"/>		
Model:	<input type="text"/>		
Dryer Type:	<input type="text"/>		
Heating Method:	<input type="text"/>		
Maximum Rated Gross Heat Input (MMBtu/hr):	<input type="text" value="3.15"/>		
Maximum % Sulfur content in Fuel:	<input type="text"/>		
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	<input type="text" value="Fired with natural gas only."/>		

46046 AMERICAN BILTRITE INC BOP200001 E13 (Surface Coating Dryer)
Print Date: 9/3/2021

Make:	<input type="text"/>	
Manufacturer:	<input type="text"/>	
Model:	<input type="text"/>	
Dryer Type:	<input type="text" value="Combustion"/>	
Heating Method:	<input type="text"/>	
Maximum Rated Gross Heat Input (MMBtu/hr):	<input type="text" value="1.65"/>	
Maximum % Sulfur content in Fuel:	<input type="text"/>	
Have you attached a diagram showing the location and/or the configuration of this equipment?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application? <input type="radio"/> Yes <input checked="" type="radio"/> No
Comments:	<input type="text" value="Fired with natural gas only."/>	

46046 AMERICAN BILTRITE INC BOP200001 E14 (Surface Coating Dryer)
Print Date: 9/3/2021

Make:	<input type="text"/>		
Manufacturer:	<input type="text"/>		
Model:	<input type="text"/>		
Dryer Type:	<input type="text" value="Combustion"/>		
Heating Method:	<input type="text"/>		
Maximum Rated Gross Heat Input (MMBtu/hr):	<input type="text" value="3.90"/>		
Maximum % Sulfur content in Fuel:	<input type="text"/>		
Have you attached a diagram showing the location and/or the configuration of this equipment?	<div><input type="radio"/> Yes <input checked="" type="radio"/> No</div>		
	Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?		
	<div><input type="radio"/> Yes <input checked="" type="radio"/> No</div>		
Comments:	<input type="text" value="Fired with natural gas only."/>		

AMERICAN BILTRITE INC (46046)

Date: 6/3/2022

BOP200001

**New Jersey Department of Environmental Protection
Control Device Inventory**

CD NJID	Facility's Designation	Description	CD Type	Install Date	Grand-Fathered	Last Mod. (Since 1968)	CD Set ID
CD1	CD001	Thermal Oxidizer For Line 5 Solvent Based Adhesive Coating Line	Oxidizer (Thermal)		No		
CD2	CD002	Thermal Oxidizer For Line 8 Solvent Based Adhesive Coating Line	Oxidizer (Thermal)	11/7/2001	No		

46046 AMERICAN BILTRITE INC BOP200001 CD2 (Oxidizer (Thermal))
Print Date: 9/3/2021

Make:	RTO 50,000 SCFM
Manufacturer:	Advanced Environmental Systems
Model:	Custom Designed
Minimum Chamber Temperature (°F):	1525
Minimum Residence Time (sec):	1
Fuel Type:	Natural gas
Description:	
Maximum Rated Gross Heat Input (MMBtu/hr):	4.5
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-Permitted Sources):	1
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	

Have you attached data from recent performance testing?

☐ Yes ☒ No

Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?

☒ Yes ☐ No

Have you attached a diagram showing the location and/or configuration of this control apparatus?

☐ Yes ☒ No

Comments:

46046 AMERICAN BILTRITE INC BOP200001 CD1 (Oxidizer (Thermal))
Print Date: 9/3/2021

Make:	Alliance Corporation
Manufacturer:	Alliance Corporation
Model:	Kronus 440
Minimum Chamber Temperature (°F):	1400
Minimum Residence Time (sec):	0.6
Fuel Type:	Natural gas
Description:	
Maximum Rated Gross Heat Input (MMBtu/hr):	5.6
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-Permitted Sources):	1
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	

Have you attached data from recent performance testing?

☐ Yes ☒ No

Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?

☐ Yes ☒ No

Have you attached a diagram showing the location and/or configuration of this control apparatus?

☐ Yes ☒ No

Comments:

AMERICAN BILTRITE INC (46046)

Date: 6/3/2022

BOP200001

**New Jersey Department of Environmental Protection
Emission Points Inventory**

PT NJID	Facility's Designation	Description	Config.	Equiv. Diam. (in.)	Height (ft.)	Dist. to Prop. Line (ft)	Exhaust Temp. (deg. F)			Exhaust Vol. (acfm)			Discharge Direction	PT Set ID
							Avg.	Min.	Max.	Avg.	Min.	Max.		
PT1	LN101	Line 1 Stack Venting Drying Oven	Square	27	30	150	180.0	160.0	200.0	9,500.0	9,000.0	9,500.0	Up	
PT2	LN201	Line 2 Stack Venting Primer	Round	19	30	150	180.0	160.0	200.0	4,000.0	3,500.0	4,000.0	Up	
PT3	LN202	Line 2 Stack Venting Drying Oven (First of Four)	Round	18	30	150	180.0	160.0	200.0	2,500.0	2,000.0	2,500.0	Up	
PT4	LN203	Line 2 Stack Venting Drying Oven (Second of Four)	Round	18	30	150	180.0	160.0	200.0	3,000.0	2,500.0	3,000.0	Up	
PT5	LN204	Line 2 Stack Venting Drying Oven (Third of Four)	Round	18	30	150	180.0	160.0	200.0	3,500.0	3,000.0	3,500.0	Up	
PT6	LN205	Line 2 Stack Venting Drying Oven (Fourth of Four)	Round	12	30	150	180.0	160.0	200.0	1,000.0	800.0	1,000.0	Up	
PT7	LN301	Line 3 Stack Venting Drying Oven	Square	27	30	170	200.0	180.0	250.0	7,600.0	7,000.0	7,600.0	Up	
PT8	LN401	Line 4 Stack Venting Primer Oven	Round	14	30	150	290.0	250.0	300.0	2,000.0	1,500.0	2,000.0	Up	
PT9	LN402	Line 4 Stack Venting Main Oven	Round	28	30	150	235.0	220.0	250.0	9,800.0	9,000.0	9,800.0	Up	
PT10	LN501	Line 5 Stack Venting Oxidizer (Solvent based Emissions)	Round	44	40	150	390.0	390.0	400.0	26,000.0	25,000.0	27,000.0	Up	
PT11	LN502	Line 5 Stack Venting Primer Oven (Water Based Emissions)	Round	20	40	150	200.0	180.0	250.0	26,000.0	25,000.0	27,000.0	Up	
PT12	LN503	Line 5 Stack Venting Main Oven (Water Based Emissions)	Round	40	40	150	200.0	180.0	250.0	26,000.0	25,000.0	27,000.0	Up	
PT13	LN800	Line 8 Stack Venting Oxidizer/Ovens (Solvent Based Emissions)	Round	72	40	150	575.0	340.0	810.0	45,000.0	40,000.0	50,000.0	Up	

AMERICAN BILTRITE INC (46046)
BOP200001

Date: 6/3/2022

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 1 C001 Line 1 Water Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	L1	Water Based Coating with or without Silicone	Normal - Steady State	E1		PT1	4-02-007-12	0.0	8,760.0		9,000.0	9,500.0	150.0	190.0
OS3	Drying Oven	Drying Oven (3.9 MM BTU/hr), Uncontrolled Emission, exhausting through PT1	Normal - Steady State	E6		PT1	4-02-008-61	0.0	8,760.0		9,000.0	9,500.0	150.0	190.0

U 2 C002 Line 2 Water Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	L2	Water Based Coating with or without Silicone	Normal - Steady State	E2		PT2 PT3 PT4 PT5 PT6	4-02-007-12	0.0	8,760.0		11,800.0	14,000.0	160.0	200.0

AMERICAN BILTRITE INC (46046)

Date: 6/3/2022

BOP200001

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 2 C002 Line 2 Water Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS3	Drying Oven	Drying Oven (4.2 MM BTU/hr), Uncontrolled Emission, exhausting through emission points PT2, PT3, PT4, PT5 and PT6	Normal - Steady State	E7		PT2 PT3 PT4 PT5 PT6	4-02-008-61	0.0	8,760.0		11,800.0	14,000.0	160.0	200.0

U 3 C003 Line 3 Water Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	L3 silicone	Water Based Coating with Silicone	Normal - Steady State	E3		PT7	4-02-007-12	0.0	8,760.0		6,000.0	7,000.0	180.0	250.0
OS3	Drying Oven	Drying Oven (3.15 MM BTU/hr), Uncontrolled Emission, exhausting through emission point PT7.	Normal - Steady State	E12		PT7	4-02-008-61	0.0	8,000.0		6,000.0	7,000.0	180.0	250.0

AMERICAN BILTRITE INC (46046)

Date: 6/3/2022

BOP200001

**New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory**

U 4 C004 Line 4 Water Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	Prime Coater	Water Based Coating with or without Silicone - Primer	Normal - Steady State	E4		PT8	4-02-007-12	0.0	8,760.0		2,000.0	2,000.0	290.0	290.0
OS2	Main Coater	Water Based Coating with or without Silicone - Main	Normal - Steady State	E8		PT9	4-02-007-12	0.0	8,760.0		9,800.0	9,800.0	235.0	235.0
OS3	Primer Oven	Primer Drying Oven (1.65 MM BTU/hr), Uncontrolled Emission, exhausting through emission point PT8.	Normal - Steady State	E13		PT8	4-02-008-20	0.0	8,760.0		2,000.0	2,000.0	290.0	290.0
OS4	Main Oven	Main Drying Oven (3.9 MM BTU/hr), Uncontrolled Emission, exhausting through emission point PT9	Normal - Steady State	E14		PT9	4-02-008-61	0.0	8,760.0		9,800.0	9,800.0	235.0	235.0

U 5 C005 Line 5 Solvent or Water Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	L5 solvent	Solvent Based Coating, 14 MM BTU/hr Drying Ovens, Emissions Controlled by Thermal Oxidizer (CD1), exhausting through PT10	Normal - Steady State	E5	CD1 (P)	PT10	4-02-007-12	0.0	8,760.0		25.0	27,000.0	300.0	390.0

AMERICAN BILTRITE INC (46046)

Date: 6/3/2022

BOP200001

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 5 C005 Line 5 Solvent or Water Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS2	L5 Water	Water Based Coating with 14 MM BTU/hr Drying Ovens, Uncontrolled Emissions, exhausting through PT11 and PT12	Normal - Steady State	E5		PT11 PT12	4-02-007-12	0.0	5,730.0		25.0	27,000.0	180.0	250.0

U 8 C0006 Line 8 Solvent Based Adhesive Surface Coater

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	Line 8	Solvent Based Coating, Emissions Controlled by a Regenerative Thermal Oxidizer (CD2), exhausting through PT13	Normal - Steady State	E9	CD2 (P)	PT13	4-02-007-12				40,000.0	50,000.0	340.0	810.0

**New Jersey Department of Environmental Protection
Subject Item Group Inventory**

Group NJID: GR1 RR Coating

Members:

Type	ID	OS	Step
U	U 3	OS0 Summary	
U	U 4	OS0 Summary	
U	U 5	OS0 Summary	
U	U 8	OS0 Summary	

Formal Reason(s) for Group/Cap:

☒ Other

Other (explain): NSPS Subpart RR Requirements

Condition/Requirements that will be complied with or are no longer applicable as a result of this Group:

Operating Circumstances:

Date: 6/3/2022

**New Jersey Department of Environmental Protection
Subject Item Group Inventory**

Group NJID: GR2 NSPS

Members:

Type	ID	OS	Step
U	U 5	OS0 Summary	
U	U 8	OS0 Summary	

Formal Reason(s) for Group/Cap:

☒ Other

Other (explain): NSPS Subparts A & RR Requirements

Condition/Requirements that will be complied with or are no longer applicable as a result of this Group:

Operating Circumstances:

Date: 6/3/2022

**New Jersey Department of Environmental Protection
Subject Item Group Inventory**

Group NJID: GR3 MACT

Members:

Type	ID	OS	Step
U	U 5	OS0 Summary	
U	U 8	OS0 Summary	

Formal Reason(s) for Group/Cap:

☒ Other

Other (explain): MACT Subpart JJJJ Requirements

Condition/Requirements that will be complied with or are no longer applicable as a result of this Group:

Operating Circumstances: