

STATEMENT OF BASIS for Glacier Garlock Bearings LLC Div. of ENPRO

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 55889 / Permit Activity Number: BOP210001

I. FACILITY INFORMATION

Glacier Garlock Bearings LLC Div. of Enpro is located at 700 MID Atlantic Pkwy. Thorofare. NJ 08086. Gloucester County and consists of a company manufacturer of metal-polymer bearings, engineered plastics bearings, fiber reinforced composite bushings, metal and bimetal bearings, bushing blocks & thrust plates and bearing assemblies. The facility is owned and operated by Glacier Garlock Bearings LLC, division of ENPRO Industry.

The facility has the potential to emit 23.36 tons per year of volatile organic compounds (VOC).

This permit does not contain any hazardous air pollutants.

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: Four (4) Mixers, six (6) small natural gas combustion sources (Ovens), one (1) Welder, five (5) Auto Cut-Off Saws, six (6) Grinders, three (3) electric sinters and some other sources. Additionally, the manufacturing process is equipped with specific particulate control systems with no less 95% reduction efficiency for particulate emissions.

Table 1 - Operating Permit Revision History (located at the end of this document) provides a summary of all the changes that have been incorporated into the operating permit through seven-day notice changes, administrative amendments, minor modifications, or significant modifications since the approval of the initial operating permit or the most recent renewal thereof. Please refer to the attached explanation sheet for the structure and configuration of conditions of approval, included in the Facility Specific Requirements section of this permit.

Health Risk Assessment was not conducted as part of the review of this permit application, and a Facility-Wide Risk Assessment was not required with this permit application, since no Air Toxics (including HAPs) emissions or risk parameters are included in this facility permit. This is consistent with NJDEP Technical Manual 1003.

This Permit Renewal does not have changes because the facility had some permit modifications prior to the 5 Year renewal. The permit was updated at the time of the modification, as shown in the Operating Permit Revision History table at the end of this document.

The changes made during this permitting action result in no allowable annual emissions changes.

IV. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring

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and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and

2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

The facility owns small combustion sources, and monitors the facility wide natural gas fuel use as the surrogate for the long-term (TPY), and short-term (lb/hr) emissions limits for NO_x, CO.

3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
 - Equipment size and capacity limitations,
 - Subject equipment being permitted at the maximum rated capacity,
 - There is no specific state or Federal standard that applies to this piece of equipment,
 - Not a pollutant of concern for this piece of equipment,
 - Agreements with EPA on the frequency of testing and monitoring for combustion sources.

Based on the above criteria, there is no direct or surrogate monitoring for the following pieces of equipment:

- U3 – E15, E16, E17, E18 Wastewater System, U4 - E301, E302, E2201 Electric Sinter Lines 1, 2 and 3, U5 – E52-welders, E53-washer/dryer < 1 MMBTU/hr, E54 - sander and U55 – shear. U100-E104 and 106 electric ovens and E107 - NG fired Curing Oven (1 MMBTU/hr).

V. APPLICABLE STATE AND FEDERAL RULES

The facility is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

The Greenhouse Gas (GHG) emissions from this facility are 3,209 TPY CO₂e and there is no GHG emissions increase. This renewal is not subject to PSD rules at 40 CFR 52.21.

VI. FACILITY'S COMPLIANCE STATUS

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

The facility has submitted a timely and complete application to renew their operating permit and an application shield is in effect.

This operating permit also includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Also, prior to the expiration of the five-year period, the facility will be required to apply for a renewal of this operating permit, at which time the Department will evaluate the facility and issue a public notice with its findings.

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VII. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias, and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

New Jersey Department of Environmental Protection

Operating Permit Revision History

GLACIER GARLOCK BEARINGS LLC DIV OF ENPRO IND PI 55889

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP210002	Minor Modification	<p>The facility proposes to modify the permitted emission unit (U-101) to add new mixing equipment and a Tapeline Process under the following operating scenarios.</p> <ul style="list-style-type: none"> • U101-OS16 - E1011 - PT209 Twin Shell Mixer – 56.6 Litres capacity • U101-OS17 - E1012 - PT209 Air Milling 100 cubic feet per minute capacity • U101-OS18 – E1013 - PT209 Preformer 100-millimeter diameter billets • U101-OS19 - E1014 - PT209 FRC Building Tapeline Process 20 feet per minute 10 inches max width • U101-OS20 - E1015 - PT212 Tapeline Burnoff Oven - 0.25 MMBtu/hr NG fired oven <p>This modification results in a facility-wide potential emissions increase of 3.2 tons per year of volatile organic compounds (VOC), 0.11 tons per year of nitrogen oxides (NOx), and 0.09 tons per year of carbon monoxide (CO).</p>	12/3/2021
BOP210003	Administrative Amendment	GGB is submitting this administrative amendment application to change the responsible official Michael Bailey with Gregory Luczny / Director of Operations, NA. Also; incorporate in the permit the facility contact as Consultant Disha Shah / Project Engineer.	10/13/2021

BOP180001	Minor Modification	<p>This modification increases the total annual production rate for the following emission units:</p> <ol style="list-style-type: none"> 1. Increase U1 (Mixing Operations -Lubricant Mush Preparations) total production rate from 2300 batches/yr to 2800 batches/yr. 2. Increase U2 (Application of Lubricant Mush and Tape Material to Sintered Master Coil) total production rate from 2300 batches/yr to 2800 batches/yr. Also; combine the total annual VOC emissions for U1 and U2 to 20 t/yr, and 3. Decrease the operating hours for U1-OS4 (Measuring Lead (Pb) DU Mix) from 4000 hours to 1500 hours lowering the Lead emissions to below reporting threshold. <p>This modification results in facility-wide potential VOC emissions decrease of 4.6 tons per year, and 0.001 tons per year of Lead.</p>	7/29/2019
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FACILITY NAME (FACILITY ID NUMBER)
BOP050001

Activity Number assigned
by the Department

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit Number
assigned by the Facility

Brief description of
emission unit

Emission Unit: U40 Sewage Sludge Incinerators
Operating Scenario: OS Summary

OR

OS2 Fluidized Bed Incinerator

OS Summary lists all rules and requirements that apply to an emission unit. An emission unit may contain one or more pieces of equipment and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules and requirements that apply to a scenario. An operating scenario represents various ways (or scenarios) a piece of equipment is permitted to operate.

Item
Number

Description of applicable
requirement

Monitoring method to
ensure compliance

Recordkeeping to show
facility's compliance

Actions and submittals
required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for
applicable requirement

Rule citation for
monitoring requirement

Rule citation for
recordkeeping requirement

Rule citation for submittal/
action requirement

Explanation Sheet for Facility Specific Requirements