

# STATEMENT OF BASIS for LAMART CORPORATION

## TITLE V OPERATING PERMIT SIGNIFICANT MODIFICATION

Program Interest (PI): 31682 / Permit Activity Number: BOP200001

### I. FACILITY INFORMATION

Lamart Corporation is located at 16 Richmond Street, Clifton, NJ 07015, Passaic County and consists of a pressure sensitive tape manufacturer. The facility is owned by Jonathan B. Hirsh and Craig Hirsh and is operated by Lamart Corporation.

The facility is classified as a major facility based on its potential to emit 51.3 tons per year of volatile organic compounds (VOC).

It is also classified as a major hazardous air pollutant (HAP) facility. A HAP emitting facility is designated as major when the allowed emissions exceed 10 tons per year of any individual hazardous air pollutant or 25 tons per year of any combination of individual hazardous air pollutants that may be emitted simultaneously.

This permit allows individual hazardous air pollutant to be emitted at a rate to not exceed: 21 tons per year of Glycol ethers, 36.9 tons per year of Hexane, 35.4 tons per year of Methyl-alcohol, 35.4 tons per year of Methyl Isobutane ketone (MIBK), 39.9 tons per year of Toluene, and 5.0 tons per year of Xylene. The facility-wide annual HAP emissions are capped at 41.4 tons.

### II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

### III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: 6 reverse coating roll lines, 7 corona treating units, 5 dryers with heat inputs less than 1 million BTU/hour each, one 12 MMBTU/hr Drying oven, and five mixers all part of a Surface coating processing equipment, equipped with two regenerative thermal oxidizers (RTO) with no less 95% reduction efficiency for VOC and HAPs emissions.

Health Risk Assessment was conducted as part of the review of a previous permit application (BOP180002) and health risk was determined to be acceptable to the Department consistent with NJDEP Technical Manual 1003. A revised Health Risk Assessment was not conducted with this permit modification, since no changes were made to Air Toxics (including HAPs) emissions or risk parameters since the last risk assessment.

This permit modification increases the annual coating operating hours at the emission unit inventory level and the compliance plan from 4,000 to 8760 for the emission unit U1 – coating operations at operating scenarios OS1-E101 and OS2-E103 rotogravure coatings to match the current approved drying operating hours of the drying ovens at operating scenarios OS5-E102, and OS7-E107. Similarly, the annual coating hours of the lab coater at operating scenario U1 OS4-E107 were increased from 2,000 to 8,760 at emission unit inventory level and compliance plan, while the annual drying operating hours of the electric drying oven at operating scenario U1 OS11-E108 were corrected from 2,000 to 8,760 at emission unit inventory level only since its compliance plan already had unrestricted hours of operation. This modification maintains the current approved annual emissions and coating material throughput and continue demonstrating compliance with the emissions by monitoring the annual coating material processed and recording the usage in a rolling monthly basis.

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There are no proposed changes to air contaminant allowable emission rates.

#### **IV. CASE-BY-CASE DETERMINATIONS**

No case-by-case determinations were required for this modification.

#### **V. EMISSION OFFSET REQUIREMENTS**

This modification is not subject to Emission Offset requirements.

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

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 surface coating operation at U1, the facility monitors the coating usage (gal/yr) and VOC and HAP content (lb/gal) of all surface coating formulations as surrogates for the long-term (TPY) emission limits for VOC and HAPs. For each surface coating formulation, the facility monitors the coating usage (gal/hr), VOC content and HAP content as surrogates for the short-term (lb/hr) emission limits for VOC and HAPs. Additionally, the temperature in the combustion chamber, and the CO concentration is monitored in the thermal oxidizer (CD102) assuring its operation over 95% VOC destruction and removal efficiency (DRE).

2. 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.

#### **VII. APPLICABLE STATE AND FEDERAL RULES**

This modification 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>

This modification is also subject to Federal regulations listed below.

NSPS Subpart A - GENERAL PROVISIONS

NSPS Subpart RR - STANDARDS OF PERFORMANCE FOR PRESSURE SENSITIVE TAPE AND LABEL SURFACE COATING OPERATION

MACT Subpart A - GENERAL PROVISIONS

MACT Subpart JJJJ - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: PAPER AND OTHER WEB COATING

The Greenhouse Gas (GHG) emissions from this facility are 23,127 TPY CO<sub>2</sub>e and there is no GHG emissions increase. This modification is not subject to PSD rules at 40 CFR 52.21.

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#### **VIII. FACILITY'S COMPLIANCE STATUS**

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

This operating permit 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.

Prior to the expiration of the Operating Permit's five-year term, the facility will be required to apply for a renewal, at which time the Department will evaluate the facility and issue a public notice with its findings.

#### **IX. 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.

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