



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Bureau of New Source Review
CN-027, Trenton, NJ 08625-0027

November 23, 1994

CERTIFIED MAIL

Mr. Daniel J. Yadzinski, Manager of Engineering
Atlantic States Cast Iron Company
183 Sitgreaves Street
Phillipsburg, NJ 08865

REFERENCE: Control Plan for Nitrogen Oxides (NO_x)
LOCATION: 183 Sitgreaves Street
Phillipsburg, NJ 08865
APC PLANT ID No: 85004
SOURCE DESCRIPTION: Cupola and Annealing Oven
APPROVAL DATE: 11/22/94

Dear Mr. Yadzinski:

On the basis of all the information available to the New Jersey Department of Environmental Protection (the Department) with reference to the application for a NO_x Control Plan for the subject equipment, which was submitted on August 19, 1994 pursuant to N.J.A.C. 7:27-19.13, the Department has determined that the proposed NO_x Control Plan satisfies the requirements of the New Jersey Air Pollution Regulations codified at N.J.A.C. 7:27-19.13. The Department therefore concludes that the Control Plan is considered Reasonably Achievable Control Technology (RACT) for the Cupola and Annealing Oven. Accordingly, the Department approves this plan with the attached conditions.

Compliance with this NO_x Control Plan, effective on May 31, 1995 and continuing thereafter, will satisfy the requirements of N.J.A.C. 7:27-19.

Sincerely,

Louis Mikolaczyk, Chief
Bureau of New Source Review

Attachment



ATTACHMENT

Control Plan for Nitrogen Oxides (NO_x)

Permittee:	Atlantic States Cast Iron Pipe Company
Location:	Phillipsburg, Warren County
BNSR Log Number:	94-0154
Source Designation:	Cupola & Annealing Oven
APC Plant ID No.:	85004

DEFINITIONS:

The Department: New Jersey Department of Environmental Protection

BTS: Bureau of Technical Services
New Jersey Department of Environmental Protection
CN-411, Trenton, NJ 08625
(609) 530-4041

Regional Enforcement Office:

N.J. Dept. of Environmental Protection
Northern Regional Air Pollution Control Office
Bureau of Enforcement Operations
1259 Route 46
Parsippany-Troy Hills, NJ 07054
(201) 299-7700

CONDITIONS OF APPROVAL

A. CONTROL STRATEGY

1. Cupola:

The Permittee shall adhere to all the conditions in the current air pollution control permit.

2. Annealing Oven:

- (a) The Permittee shall annually adjust the combustion process of the oven **before May 1 of each year**. Pursuant to N.J.A.C. 7-27-19.16, the Permittee shall:
1. Inspect the burner(s), and clean or replace any components of the burner(s) as necessary to minimize total emissions of NO_x and carbon monoxide (CO);
 2. Inspect the flame pattern and make any adjustments to the burner(s) necessary to optimize the flame pattern; and
 3. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.
- (b) An exceedance of an emission limit which occurs during an adjustment of the combustion process under (a)2 or 3 above, as a result of the adjustment, is not a violation of this approval. Before the combustion adjustment begins, and after it has been completed, the maximum emission rate of NO_x shall not exceed 0.15 lbs/MMBTU.
- (c) The Permittee shall record each adjustment conducted under (a) above in a permanently bound log book or other format approved in writing by the Department, containing the following information for each adjustment:
1. The date of the adjustment and the times at which it began and ended;
 2. The name, title and affiliation of the person who made the adjustment;
 3. The NO_x concentration in the effluent stream in either ppmv or ppmvd, after each adjustment was made;
 4. The CO concentration in the effluent stream, in either ppmv or ppmvd, after each adjustment was made;
 5. The oxygen concentration at which the CO and NO_x concentrations pursuant to (c)3 and 4 were measured.

B. NO_x EMISSION LIMIT

Effective May 31, 1995 the emission rates of nitrogen oxides (NO_x) from the Cupola and Annealing Oven shall not exceed 0.188 lbs/MMBTU and 0.15 lbs/MMBTU respectively.

C. LIMITS ON OPERATION

1. The cupola shall operate no more than than 3600 hours per year. Compliance with this provision shall be achieved by recordkeeping.

2. The maximum amount of natural gas burned in the annealing oven shall not exceed **271 million standard cubic feet per year**. Compliance with this provision shall be achieved by recordkeeping.

D. STACK TESTING

The Department may require stack tests to be conducted at 5-year intervals, using protocols approved in advance by the Department.

E. RECORDKEEPING

1. The Permittee shall record the amount of natural gas burned in the Annealing Oven.
2. Records and log books shall be maintained on site for a period of 5 years, and shall be made available during normal working hours for review by the Department upon request.

F. REVISION OF STATE IMPLEMENTATION PLAN (SIP)

A revision to the state implementation plan (SIP) for ozone to include this NO_x Control Plan will be submitted to EPA for approval. Denial of the SIP revision by EPA may cause the approval to be revoked, or may result in modification of the control plan.

G. MODIFICATION OF NO_x CONTROL PLAN

Approval of an amended NO_x Control Plan will be required by the Department before any alterations may be made to the affected sources that will cause the NO_x emission rate to increase.

The maximum amount of natural gas burned in the calendar year shall not exceed 175 million standard cubic feet per year. Compliance with this provision shall be achieved by

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