

August 5, 2022

Mr. Thomas Madan  
New Jersey Department of Environmental Protection (NJDEP)  
Bureau of Stationary Sources  
Division of Air Quality  
401 E. State Street, Mail Code 401-02  
P.O. Box 420  
Trenton, New Jersey 08625-0420

RE: *Camden Iron & Metal, Inc. (P.I. No 51893)*  
*Preconstruction Air Permit Application PCP210001*

Dear Mr. Madan:

On behalf of Camden Iron & Metal, Inc. (CIM), Trinity Consultants, Inc. (Trinity) is submitting this response to address your comments regarding the air permit application (PCP210001) for the material handling operations that were noted in your email dated July 21, 2022.

For ease of reference, each comment/question has been restated in bold with a response following.

**Comment 1. Reason for Application: This is not a permit modification; this is a revision of a previous application for construction of new source. Please complete this section to describe the source operations, as was previously provided. Please include reference to any related Enforcement actions.**

Response 1. The reason for application section in the attached RADIUS file has been updated per NJDEP's request.

**Comment 2. Emission Unit/Batch Process Inventory: The entry listed in the OS1, Raw Material window, cannot be read. Please limit the character length to be visible when a PDF copy of the details window is printed. Please revise and then run a print preview to verify if the entry can be read.**

Response 2. In response to a prior comment, CIM updated the raw material description to "Ferrous Metals & Related non-HAP Materials". To ensure the description is visible when printing a pdf copy of the application, the OS1 raw material description in OS1 has been abbreviated to "Ferrous Metal & non-HAP Mtl" in the attached RADIUS file.

**Comment 3. PTE Calculations: As provided, truck unloading operations with a maximum of 800 tons/hr may emit particulates at a rate of 2.64 lb/hr, and ship loading operations with a maximum of 800 tons/hr may emit particulates at a rate of 2.64 lb/hr. Please clarify if these activities may occur within the same hour. If the listed activities may occur within the same hour, there may be a potential particulate emission rate of 5.28 lb/hr. If needed, please update the PTE Table and the unlocked PTE Calculation spreadsheet.**

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Response 3. Material unloading occurs during business hours, Monday through Friday. Ship loading may occur one to two times per month. Although infrequent, it is possible for these unique events to occur within the same hour. As such, the PTE tables and calculations have been updated. The unlocked excel file has been included as an attachment uploaded on NJDEPOnline with this submittal.

**Comment 4. Please confirm if there is no additional, reportable TSP, PM-10, or PM-2.5 emissions from any other activity on-site.**

Response 4. Per your request CIM evaluated the PTE from all significant source operations on site and has ensured that all contaminants emitted above the 0.05 lb/hr reporting threshold are included in the PTE tables.

\*\*\*\*\*

As discussed in the meeting held June 29, 2022, CIM is reviewing the Department's comments related to the Facility's Dust Management Plan and will reach out shortly to schedule a meeting. If you have any questions or comments about the information presented in this letter and application, please do not hesitate to contact me at [cadduci@trinityconsultants.com](mailto:cadduci@trinityconsultants.com) or 609.318.5500.

Sincerely,

TRINITY CONSULTANTS



Carla Adduci  
Managing Consultant

Attachments

cc: Ms. Cynthia McKeown, CIM  
Mr. Stephen Deacon, CIM

**ATTACHMENT 1**

**RADIUS File**

**New Jersey Department of Environmental Protection  
Reason for Application**

**Permit Being Modified**

**Permit Class:**                      **Number:** 0

**Description of Modifications:** CIM is submitting this amended RADIUS file in response to the application comments from NJDEP via email dated January 31st, 2022, as further clarified by the Department's email dated March 7, 2022. CIM currently operates a scrap metal staging and loading facility (P.I. # 51893) in Camden, NJ. At the facility, the ferrous metals are transferred onto ships/vessels for further transport. On June 30, 2020, CIM received a Notice of Violation (NOV) related to compliance inspections at the Pier facility on December 12, 2019 and February 19, 2020. The NOV alleged the installation and operation of "a material handling source operation that emits one or more air contaminants directly to the outdoor air" without first obtaining an air permit. The document specifically identifies the front end loaders, industrial claw grabber and industrial magnet as those material handling processes with the ability to "process" in excess of 50 pounds of scrap metal (and/or other materials) in any one hour. As previously discussed with the NJDEP, CIM does not agree that the equipment (all of which is mobile) identified in the aforementioned NOV, or the operation as a whole, requires a preconstruction air permit pursuant to New Jersey's Subchapter 8 regulations. However, CIM worked with Trinity to develop and submit an air permit application for the facility at NJDEP's request.

New Jersey Department of Environmental Protection  
Facility Profile (General)

Facility Name (AIMS): Camden Iron & Metal, Inc.

Facility ID (AIMS): 51893

Street FRONT ST & PINE ST  
Address: CAMDEN, NJ 08104

<b>State Plane Coordinates:</b> <b>X-Coordinate:</b> <b>Y-Coordinate:</b> <b>Units:</b>  <b>Datum:</b> <b>Source Org.:</b> <b>Source Type:</b>
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Mailing 201 NORTH FRONT ST  
Address: CAMDEN, NJ 08102

County: Camden  
Location  
Description:

<b>Industry:</b> <b>Primary SIC:</b> <b>Secondary SIC:</b> <b>NAICS:</b> 423930
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**New Jersey Department of Environmental Protection  
Facility Profile (General)**

**Contact Type: Air Permit Information Contact**

**Organization:**

**Name:** Cynthia McKeown

**Title:** Environmental, Health & Safety Manager

**Phone:** (856) 365-7500 x

**Fax:** ( ) - x

**Other:** ( ) - x

**Type:**

**Email:** Cynthia.Mckeown@emrgroup.com

**Org. Type:**

**NJ EIN:**

**Mailing  
Address:**

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**Contact Type: Consultant**

**Organization:**

**Name:** Carla Adduci

**Title:** Managing Consultant

**Phone:** (609) 318-5500 x1758

**Fax:** ( ) - x

**Other:** ( ) - x

**Type:**

**Email:** cadduci@trinityconsultants.com

**Org. Type:**

**NJ EIN:**

**Mailing  
Address:**

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**Contact Type: Fees/Billing Contact**

**Organization:**

**Name:** Cynthia McKeown

**Title:** Environmental, Health & Safety Manager

**Phone:** (856) 365-7500 x

**Fax:** ( ) - x

**Other:** ( ) - x

**Type:**

**Email:** Cynthia.Mckeown@emrgroup.com

**Org. Type:**

**NJ EIN:**

**Mailing  
Address:**

**New Jersey Department of Environmental Protection  
Facility Profile (General)**

**Contact Type:** Responsible Official

**Organization:**

**Name:** Stephen Deacon

**Title:** COO

**Phone:** (856) 365-7500 x

**Fax:** ( ) - x

**Other:** ( ) - x

**Type:**

**Email:** stephen.deacon@emrgroup.com

**Org. Type:**

**NJ EIN:**

**Mailing  
Address:**

**New Jersey Department of Environmental Protection  
Facility Profile (Permitting)**

- |   |    |
|---|----|
| 1. Is this facility classified as a small business by the USEPA?  | No |
| 2. Is this facility subject to N.J.A.C. 7:27-22?  | No |
| 3. Are you voluntarily subjecting this facility to the requirements of Subchapter 22?                         | No |
| 4. Has a copy of this application been sent to the USEPA?   | No |
| 5. If not, has the EPA waived the requirement?  | No |
| 6. Are you claiming any portion of this application to be confidential?                                       | No |
| 7. Is the facility an existing major facility?  | No |
| 8. Have you submitted a netting analysis?   | No |
| 9. Are emissions of any pollutant above the SOTA threshold?   | No |
| 10. Have you submitted a SOTA analysis?   | No |
| 11. If you answered "Yes" to Question 9 and "No" to Question 10, explain why a SOTA analysis was not required |    |
| 12. Have you provided, or are you planning to provide air contaminant modeling?                               | No |



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

<b>Equip. NJID</b>	<b>Facility's Designation</b>	<b>Equipment Description</b>	<b>Equipment Type</b>	<b>Certificate Number</b>	<b>Install Date</b>	<b>Grand-Fathered</b>	<b>Last Mod. (Since 1968)</b>	<b>Equip. Set ID</b>
E1	Yard Ops	Yard Operations	Other Equipment		8/1/2003	No		

000000 E1 (Other Equipment)  
Print Date: 7/20/2022

Make:

Manufacturer:

Model:

Equipment Type:

Recycled Material Handling Equipment

Capacity:

800.00

Units:

tons/hr

Description:

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

Yes  
 No

Have you attached any manuf.'s data or specifications to aid the Dept. in its review of this application?

Yes  
 No

Comments:

**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	Air Em	Outdoor Air Emission	Surface											

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

**U 1 Yard Ops Yard Operations**

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	Yard Ops	Scrap metal yard operations	Normal - Steady State	E1		PT1	3-99-999-89	0.0	8,760.0			0.0	100.0	

## 000000 U1 OS1 (Raw Material)

Print Date: 7/20/2022

Raw Material	CAS Number	Physical State	Molecular Weight (lbs/lbs-mole)	Does the Material Contain VOC?	Weight Fraction (%)	Vapor Pressure @ 70°F (mmHg)	Organic Density	Units
Ferrous Metal & non-HAP Mtl		Solid		No	100.00			

**New Jersey Department of Environmental Protection  
Potential to Emit**

**Subject Item:** U1 Yard Ops  
**Operating Scenario:** OS0 Summary  
**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
PM-10 (Total)	3.27000000		0.00000000	3.27000000	tons/yr	No
PM-2.5 (Total)	3.27000000		0.00000000	3.27000000	tons/yr	No
TSP	3.27000000		0.00000000	3.27000000	tons/yr	No

**Subject Item:** U1 Yard Ops  
**Operating Scenario:** OS1  
**Step:**

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
PM-10 (Total)	5.28000000		0.00000000	5.28000000	lb/hr	No
PM-2.5 (Total)	5.28000000		0.00000000	5.28000000	lb/hr	No
TSP	5.28000000		0.00000000	5.28000000	lb/hr	No

## **ATTACHMENT 2**

### **Potential to Emit Calculations**

**Potential To Emit Calculations**

Camden Iron & Metal, Inc.  
 Front & Pine - Camden, NJ

Uncontrolled PM Emission Factor <sup>1</sup>	
Particle Size Multiplier - k	0.74
Mean Wind Speed (mph) - U <sup>2</sup>	8.3
Material Moisture Content (%) - M <sup>3</sup>	2.525
Emission Factor - Loading (lb/ton) - E	0.0033

$$E = k(0.0032) \frac{\left(\frac{U}{5}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}} \text{ (pound [lb]/ton)}$$

Assumptions <sup>4</sup>	
Average Shipping (tons/month)	82,500
Anticipated Max Hourly Throughput (tons/hour) <sup>5</sup>	800

Potential To Emit (PTE)		
Activity	(lb/hr)	(tons/yr)
Truck/Material Unloading	2.64	1.63
Ship Loading	2.64	1.63
TOTAL =	5.28	3.27

**Notes:**

- <sup>1</sup> Equation 1 from AP-42 chapter 13.2.4 is used to develop emission factor. Selected Particle Size is conservative at < 30 um.
- <sup>2</sup> Mean wind speed is from National Weather Service data for 2020 (<https://w2.weather.gov/climate/index.php?wfo=phi>)
- <sup>3</sup> Average moisture content is used from AP-42 13.2.4 (0.25-4.8 %).
- <sup>4</sup> Assumptions were received from EMR via email. Used anticipated monthly throughput from either Kaighn Ave. or CIM Pier Facility (plus 50% safety factor).
- <sup>5</sup> Anticipated Max Hourly Throughput is based on input from the facility. Used the maximum anticipated hourly throughput for either Kaighn Ave. or CIM Pier.
- <sup>6</sup> Material unloading occurs during business hours Monday through Friday. Ship loading may occur 1-2 times per month. Although infrequent, it is possible for these unique events to occur simultaneously.