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November 12, 2018

Mr. Adam Pagarigan
Bureau of Stationary Sources
New Jersey Department of Environmental Protection
PO Box 420, Mail Code 401-02
Trenton, New Jersey 08625-0420

Reference: Somerset Raritan Valley Sewerage Authority
Program Interest Number 35857
Title V Operating Permit Renewal

Dear Mr. Pagarigan:

On behalf of the Somerset Raritan Valley Sewerage Authority (SRVSA) we are initiating the renewal of the facility's Title V Operating Permit with the timely submittal of an administratively complete Operating Permit Renewal Application pursuant to N.J.A.C. 7:27-22.30(c). The renewal application consists of the RADIUS renewal application, the Attachment to the RADIUS Operating Permit Renewal Application and other supporting documentation including this cover letter which is being submitted through NJDEP Online.

Changes that have been incorporated into SRVSA's Title V operating during the last five years include:

- The approval of minor modification BOP140001 on April 20, 2015 increased the maximum sludge feed rate for U1 OS1 to 17.4 DTPD, established a new maximum dry sludge feed rate of 19 DTPD for U1 OS2 and reduced the maximum dry sludge feed rate for U1 OS4 to 25.8 DTPD based on TST120001 stack test results.
- The five-year renewal of the operating permit (BOP130001) was approved on

June 27, 2016. The U1 compliance plan and emissions in SRVSA's operating permit renewal were modified due to the FBSSIs being rendered inoperable and the operating scenario designation for FBSSI Unit R2 was revised from U1 OS4 to U1 OS2.

RENEWAL APPLICATION FORMS

The attached "SRVSA 35857 OPRenewal.pdf" contains the completed forms supplied in the "Attachment to the RADIUS Operating Permit Renewal Application" package (revised June 29, 2018) which was obtained from Department's website.

Section 1 – Compliance Requirements

A. Compliance Assurance Monitoring (CAM) Applicability Determination

The SRVSA 35857 facility has no emission units subject to the CAM rule. Note that SRVSA is not a major source for any air contaminants as defined by EPA at 40 CFR 70.2.

B. Health Risk Assessment

For SRVSA, the facility-wide (total) HAP emissions are equivalent to the U1 OS2 HAP emissions, such that the risk of FBSSI Unit R2 is equivalent to the SRVSA 35857 Facility-Wide risk.

A 1st level health risk screening for FBSSI Unit R2 (U1 OS2) was submitted to the Department with the BOP180001 significant modification application for installation of a new Mercury Emission Control System (MECS) for compliance with 40CFR62 Subpart LLL. This evaluation indicated a total incremental cancer risk (IR) for U1 OS2 to be 12.4 per million (1.24E-05). BEP subsequently modeled HAP emissions from sludge incinerator R2 and concluded the proposed U1 OS2 HAP emissions result in negligible cancer and non-cancer risks.

C. Acid Rain Program

The SRVSA 35857 facility is not subject to the Acid Rain Program.

D. N.J.A.C. 7:27-18 Netting Analysis and General Operating Permit Determination

During the 5-year permit term, with the approval of BOP130001, U1 emissions were decreased to reflect PTEs without FBSSI emissions after both sludge incinerators 1 and 2 were disabled for compliance with 40CFR62 Subpart LLL.

A copy of the last netting analyses, prepared consistent with N.J. A.C. 7:27-18.7 and submitted to the Department on June 11, 2018 as part of BOP180001 significant modification for 40CFR62 Subpart LLL, is provided in the supporting documentation attachments submitted with the Radius application for renewal of the operating permit.

Section 2 – Certification

This Radius renewal application submittal is being electronically certified via NJDEP Online. No additional certification is required and the paper certification form in Section 2 has been left blank.

Section 3 – Summary of 7-Day Notice Changes

No seven-day-notice changes have been submitted since the date of issuance of the most recent operating permit, BOP130001.

Section 4 – Summary of the Results from Stack Testing and Monitoring

The current BOP130001 operating permit does not require stack emissions testing, continuous emissions monitors or continuous opacity monitors and the form in Section 4 has been left blank.

A summary of results for the U1 OS2 (FBSSI R2) emissions testing conducted on April 25 and 26, 2018 and copies of the continuous emissions monitoring reports submitted for the incinerators subsequent to the issuance of BOP130001 on June 27, 2017 are provided in the attached supporting documentation pursuant to N.J.A.C. 7:27-22.30(d)5.

Section 5 – Compliance Status

The first part of this section lists each subject item from Section D, Compliance Plan and Inventories, of the operating permit and indicates the compliance status with all Facility Specific Requirements (FSR) for each subject item. Note that individual operating scenario and reference numbers for the FSR of each subject item and specific methods used to determine compliance are required only for permit requirements that are out of compliance for a particular subject item.

The SRVSA 35857 facility is in compliance with all of the Facility Specific Requirements for each subject item of the BOP130001 operating permit.

The second part of Section 5 provides compliance schedules that are included in Section D of the operating permit or proposed to address any non-compliance issues at the time of completing the renewal application. The Compliance Schedule form in Section 5 has been left blank; the BOP130001 permit contains no compliance schedules and the Authority is in compliance with all Facility Specific Requirements.

APPLICATION FEE

Pursuant to N.J.A.C. 7:27-22.31(d) the application fee for a renewal of an operating permit is \$125 for each piece of significant equipment. As listed in the BOP160001 Equipment Inventory there are a total of 12 pieces of significant equipment; therefore the renewal application fee is $12 \times \$125 = \$1,500$. We understand that the Authority will be invoiced for this amount by NJDEP after receipt of the application in accordance with N.J.A.C. 7:27- 22.31(g).

SUBMITTAL

The operating permit renewal application RADIUS file (15224418.316) submitted through NJDEP Online contains the following four sections: Reason for Application, Facility Profile (General), Facility Profile (Permitting), and Insignificant Source Emissions. The Attachment to the RADIUS Operating Permit Renewal Application, this cover letter and other supporting documentation referenced herein are provided as attachments to the RADIUS renewal application.

Please review the renewal application for administrative completeness at your earliest convenience. If you have any questions, please don't hesitate to contact us.

Very truly yours,
KEMS LLC



Karl E. Monninger
President

Attachments: RADIUS Renewal Application
Attachment to the RADIUS Operating Permit Renewal Application
BOP180001 Netting Analysis
U1 OS2 Stack Test Results
Excess Emissions and Monitoring Performance Reports
Subpart O Oxygen Reports
BOP130001 Equipment Inventory

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