

June 10, 2021

Ms. Aliya Khan  
NJDEP – Air Quality Permitting and Planning  
Bureau of Stationary Sources  
Operating Permits Section  
401 E. State Street, 2<sup>nd</sup> Floor  
P.O. Box 420, Mail Code 401-02  
Trenton, NJ 08625-0420

*RE: CPV Shore, LLC – Woodbridge Energy Center (PI No. 18940)  
Title V Operating Permit Renewal Application*

Dear Ms. Khan:

On behalf of CPV Shore, LLC Trinity Consultants, Inc. (Trinity) is submitting the attached Title V Air Operating Permit Renewal Package for the Woodbridge Energy Center (WEC) located in Keasbey, Middlesex County, New Jersey. The current Title V permit is set to expire on September 12, 2022. As per N.J.A.C 7:27-22.30(c), for a Title V renewal application to be considered 'timely', an administratively complete Title V renewal application needs to be submitted at least 12 months prior to the expiration date. However, consistent with N.J.A.C. 7:27-22.4(e), the applicant is encouraged to submit the renewal application at least 15 months prior to expiration of the operating permit. WEC is submitting this renewal application 15 months prior to permit expiration and believes this application satisfies the administrative completeness criteria. As such, WEC requests that the New Jersey Department of Environmental Protection (NJDEP) grant an application shield to WEC for continued operation, while the Department reviews the renewal application.

The Operating Permit Renewal Application for WEC consists of the following:

- ▶ This cover letter;
- ▶ Attachment 1: RADIUS file;
- ▶ Attachment 2: Attachment to the RADIUS Operating Permit Renewal Application;
- ▶ Attachment 3: HAP Emission Calculations; and
- ▶ Attachment 4: Acid Rain Renewal Application.

### **PROPOSED ADMINISTRATIVE PERMIT CHANGES**

As part of this Title V Operating Permit (TVOP) renewal application WEC has reviewed its current operating permit to confirm whether any of the following changes have occurred:

- ▶ Removal of equipment no longer in service;
- ▶ Addition of equipment not previously included in the TVOP and updates to existing sources;
- ▶ Review and revision of miscellaneous insignificant sources list;
- ▶ Applicability of new requirements promulgated since the issuance of the current permit;
- ▶ Modification of existing permit conditions; and
- ▶ Other miscellaneous administrative changes that affect the permit.

### **HEADQUARTERS**

As a result of that review the following changes to existing permit conditions are being requested in this renewal:

- ▶ Addition of insignificant sources (diesel rental engines < 1 MMBtu/hr) as IS3. These engines are rented twice per year during maintenance outages.
- ▶ U3; OS Summary Reference #21: This condition is a duplicate of Reference #11; please remove.
- ▶ U5; OS1 Reference #4: WEC requests that the language for construction, repair and maintenance (CRM) be added to the permit for the emergency generator (U5).
- ▶ U6; OS Summary Reference #8: Please add neutralizing agent (i.e., soda ash) to the list of chemicals used for pH control.
- ▶ U6: OS1 Reference # 7 and #8: WEC requests removal of the non-air permitting related ORP and pH requirements from the Operating Permit. These requirements have no relevance to air contaminant emissions, a demonstration of compliance with emission limitations or related standards, or air pollution control.

### **COMPLIANCE ASSURANCE MONITORING (CAM)**

U.S. EPA promulgated the CAM Rule at 40 CFR 64 on October 22, 1997. U.S. EPA developed the regulation as a means for providing reasonable assurance that an emissions unit is in continuous compliance with applicable requirements for affected units located at major stationary sources subject to Title V permitting. CAM requirements apply to units that are subject to an emission limitation or standard, use a control device to meet these limits, and have potential pre-control emissions equal to or greater than 100% of the amount required for a source to be classified as major.

The turbines have potential pre-control emissions of NO<sub>x</sub> and CO greater than 100% of the major source threshold, however the facility utilizes a continuous emissions monitoring system (CEMS) to monitor emissions of NO<sub>x</sub> and CO from the turbines. 40 CFR Part 64.2(b)(vi) exempts emission limitations/standards for which a continuous compliance determination method is required (e.g. CEMS). Therefore, a CAM plan is not required.

### **N.J.A.C. 7:27-18 NETTING ANALYSIS AND GENERAL OPERATING PERMIT DETERMINATION**

Major facilities that submit air permit applications requesting an increase in allowable emissions are required to include a netting analysis to ensure the resulting net emissions increase at the facility is not significant pursuant to N.J.A.C. 7:27-18.7. During the five-year permit term WEC has submitted one air permit modification application (BOP160004) that proposed an emissions increase. A Subchapter 18 applicability analysis was submitted with that permit application.

### **NEW REGULATORY REQUIREMENTS**

The following subsections document the applicability determinations made for new/revise Federal and State air quality regulations which became effective since the current Title V permit was issued.

#### **NJAC 7:27-17: "CONTROL AND PROHIBITION OF AIR POLLUTION BY TOXIC SUBSTANCES"**

N.J.A.C. 7:27-17 (Subchapter 17) applies to any source or equipment that has the potential to emit any Group 1 or Group 2 air toxic (TXS) at a rate greater than 0.1 lb/hr. The latest version of this regulation was adopted on December 14, 2017 and became effective on January 16, 2018. NJDEP updated many hazardous air pollutant (HAP) reporting thresholds and consolidated these thresholds into Subchapter 17. Applications for modifications submitted after February 12, 2018 and Title V renewal applications for sources

with a permit expiration date after February 12, 2021 must evaluate HAPs against the revised thresholds. WEC evaluated HAPs from each source against the revised thresholds. HAP calculations are included in **Attachment 3**. Per NJDEP guidance a Title V minor modification application to add in any HAPs not currently included in the facility's existing Title V permit is being submitted under separate cover.

**NJAC 7:27-19: "CONTROL AND PROHIBITION OF AIR POLLUTION BY OXIDES OF NITROGEN"**

On November 6, 2017, the NJDEP published amendments to the Air Pollution Control Rules, N.J.A.C. 7:27-19 that pertain to Reasonably Available Control Technology (RACT) requirements for NO<sub>x</sub>. The amended NO<sub>x</sub> RACT rule establishes new limits on NO<sub>x</sub> emissions from existing natural gas-fired simple cycle combustion turbines compressing gaseous fuel at major NO<sub>x</sub> facilities (compressor turbines) and stationary reciprocating engines greater than 200 hp but less than 500 hp combusting natural gas and compressing gaseous fuels at major NO<sub>x</sub> facilities (compressor engines).

WEC does not have any equipment subject to these NO<sub>x</sub> RACT amendments.

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If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at (609) 318-5500 ext. 1758 or Ms. Susann Brown at (732) 661-3305.

Sincerely,

Trinity Consultants



Carla Adduci  
Managing Consultant

Attachments

cc: S. Brown, WEC  
C. Bergeron, WEC

**ATTACHMENT 1**  
**RADIUS Application**

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

**Permit Being Modified**

**Permit Class:** BOP      **Number:** 190002

**Description  
of Modifications:**

Woodbridge Energy Center is submitting a 5 year Title V renewal application.

In accordance with NJAC 7:27-17, Title V renewal applications for sources with a permit expiration date after February 12, 2021 must evaluate HAPs against the revised thresholds. WEC evaluated HAPs from each source against the revised thresholds. HAP calculations are included in Attachment 3. A minor modification application will be submitted to add HAPs to the permit.

As part of this renewal application, WEC is requesting the following administrative changes:

- \* Addition of insignificant sources (diesel rental engines < 1 MMBtu/hr) as IS3. These engines are rented twice per year during maintenance outages.
- \* U3; OS Summary Reference #21: This condition is a duplicate of Reference #11; please remove.
- \* U5; OS1 Reference #4: WEC requests that the language for construction, repair and maintenance (CRM) be added to the permit for the emergency generator (U5).
- \* U6; OS Summary Reference #8: Please add neutralizing agent (i.e., soda ash) to the list of chemicals used for pH control.
- \* U6; OS1 Reference # 7 and #8: WEC requests removal of the non-air permitting related ORP and pH requirements from the Operating Permit. These requirements have no relevance to air contaminant emissions, a demonstration of compliance with emission limitations or related standards, or air pollution control.

See additional details in the cover letter and supporting information.

New Jersey Department of Environmental Protection  
Facility Profile (General)

Facility Name (AIMS): Woodbridge Energy Center

Facility ID (AIMS): 18940

Street 1070 RIVERSIDE DR  
Address: KEASBEY, NJ 08832-1213

Mailing 1070 RIVERSIDE DR  
Address: KEASBEY, NJ 08832-1213

County: Middlesex  
Location Southern Woodbridge Township near Raritan  
Description: River

|                                 |                    |
|---------------------------------|--------------------|
| <b>State Plane Coordinates:</b> |                    |
| <b>X-Coordinate:</b>            | 557,672            |
| <b>Y-Coordinate:</b>            | 4,485,142          |
| <b>Units:</b>                   | Other              |
| <b>Datum:</b>                   | NAD83              |
| <b>Source Org.:</b>             | Submittal Document |
| <b>Source Type:</b>             | Digital Image      |

|                       |        |
|-----------------------|--------|
| <b>Industry:</b>      |        |
| <b>Primary SIC:</b>   |        |
| <b>Secondary SIC:</b> |        |
| <b>NAICS:</b>         | 221112 |

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

**Contact Type: Air Permit Information Contact**

**Organization:** CPV Shore, LLC

**Org. Type:** LLC

**Name:** Susann Brown

**NJ EIN:** 14627389969

**Title:** Compliance Specialist

**Phone:** (732) 661-3305 x

**Mailing Address:** 1070 Riverside Dr.

**Fax:** (732) 738-1829 x

Keasbey, NJ 08832-1213

**Other:** (732) 407-3894 x

**Type:** Mobile

**Email:** sbrown@cpvwoodbridge.com

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**Contact Type: Consultant**

**Organization:** Trinity Consultants

**Org. Type:** Corporation

**Name:** Carla Adduci

**NJ EIN:** 06086161800

**Title:** Managing Consultant

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

**Mailing Address:** 15 Roszel Road

**Fax:** ( ) - x

Suite 105

**Other:** (407) 913-9547 x

Princeton, NJ 08540

**Type:** Mobile

**Email:** cadduci@trinityconsultants.com

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**Contact Type: Fees/Billing Contact**

**Organization:** CPV Shore, LLC

**Org. Type:** LLC

**Name:** Michelle Davis

**NJ EIN:** 14627389969

**Title:** Business Manager

**Phone:** (732) 661-3301 x

**Mailing Address:** 1070 Riverside Dr.

**Fax:** (732) 738-1829 x

Keasbey, NJ 08832-1213

**Other:** ( ) - x

**Type:**

**Email:** mdavis@cpvwoodbridge.com

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

**Contact Type: General Contact**

**Organization:** CPV Shore, LLC **Org. Type:** LLC  
**Name:** Chip Bergeron **NJ EIN:** 15627389969  
**Title:** Plant Manager  
**Phone:** (732) 661-3301 x **Mailing Address:** 1070 Riverside Dr.  
**Fax:** (732) 738-1829 x **Address:** Keasbey, NJ 08832-1213  
**Other:** (732) 585-0182 x  
**Type:** Mobile  
**Email:** cbergeron@cpvwoodbridge.com

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**Contact Type: On-Site Manager**

**Organization:** Consolidated Asset Management Services (NJ) **Org. Type:** LLC  
**Name:** Chip Bergeron **NJ EIN:** 14634781182  
**Title:** Plant Manager  
**Phone:** (732) 661-3301 x **Mailing Address:** 1070 Riverside Dr.  
**Fax:** (732) 738-1829 x **Address:** Keasbey, NJ 08832-1213  
**Other:** (732) 585-0182 x  
**Type:** Mobile  
**Email:** cbergeron@cpvwoodbridge.com

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**Contact Type: Operator**

**Organization:** Consolidated Asset Management Services (NJ) **Org. Type:** LLC  
**Name:** Chip Bergeron **NJ EIN:** 14634781182  
**Title:** Plant Manager  
**Phone:** (732) 661-3301 x **Mailing Address:** 1070 Riverside Dr.  
**Fax:** (732) 738-1829 x **Address:** Keasbey, NJ 08832-1213  
**Other:** (732) 585-0182 x  
**Type:** Mobile  
**Email:** cbergeron@cpvwoodbridge.com



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

**Contact Type: Owner (Current Primary)**

**Organization:** CPV Shore, LLC

**Org. Type:** LLC

**Name:** Tom Favinger

**NJ EIN:** 14627389969

**Title:** VP Asset Manager

**Phone:** (240) 723-2314 x

**Mailing Address:** 8403 Colesville Road

**Fax:** ( ) - x

Suite 915  
Silver Spring, MD 20910

**Other:** (301) 648-6575 x

**Type:** Mobile

**Email:** tfavinger@cpv.com

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**Contact Type: Responsible Official**

**Organization:** CPV Shore, LLC

**Org. Type:** LLC

**Name:** Chip Bergeron

**NJ EIN:** 15627389969

**Title:** Plant Manager

**Phone:** (732) 661-3301 x

**Mailing Address:** 1070 Riverside Dr.

**Fax:** (732) 738-1829 x

Keasbey, NJ 08832-1213

**Other:** (732) 585-0182 x

**Type:** Mobile

**Email:** cbergeron@cpvwoodbridge.com

**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?                                                              | Yes             |
| 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?                                                                | Yes             |
| 8. Have you submitted a netting analysis?                                                                     | No              |
| 9. Are emissions of any pollutant above the SOTA threshold?                                                   | Yes             |
| 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 | Title V renewal |
| 12. Have you provided, or are you planning to provide air contaminant modeling?                               | No              |

**New Jersey Department of Environmental Protection  
Insignificant Source Emissions**

| IS NJID | Source/Group Description             | Equipment Type  | Location Description | Estimate of Emissions (tpy) |       |       |    |       |       |    |              |               |
|---------|--------------------------------------|-----------------|----------------------|-----------------------------|-------|-------|----|-------|-------|----|--------------|---------------|
|         |                                      |                 |                      | VOC (Total)                 | NOx   | CO    | SO | TSP   | PM-10 | Pb | HAPS (Total) | Other (Total) |
| IS3     | Diesel Rental Engines (< 1 MMBtu/hr) | Portable Engine | Throughput Facility  | 0.140                       | 1.760 | 0.380 |    | 0.120 | 0.120 |    |              |               |
| Total   |                                      |                 |                      |                             |       |       |    |       |       |    |              |               |

**ATTACHMENT 2**

**Attachment to the RADIUS Operating Permit Renewal Application**



**New Jersey Department of Environmental Protection  
Division of Air Quality**

**Attachment to the  
RADIUS Air Operating Permit Renewal  
Application**

Submittal Date: 06/11/2021

Facility Name: Woodbridge Energy Center

PI#: 18940

This package must be submitted as an attachment to the RADIUS Air Operating Permit Renewal Application. The forms contained in this package must not be altered. Use of any non-standard forms will require resubmittal of the renewal application. If the file is too large to submit, please perform a Save As to optimize the file for Fast Web View using Adobe PDF software. Contact the Department if this does not solve the problem, and you still have issues submitting this package.

**New Jersey Department of Environmental Protection  
401 East State Street, 2<sup>nd</sup> Floor, P.O. Box 420, Mail Code 401-02, Trenton, NJ 08625-0420**

**Operating Permits Helpline 609-633-8248**

Revised Apr 16, 2020

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## Applying for an Air Operating Permit Renewal

This summary was prepared to assist you in renewing an operating permit. To continue lawful operation of a facility that has obtained an approved operating permit, a permittee must initiate the renewal of the operating permit by submitting a timely and administratively complete permit application. A complete operating permit renewal application consists of the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package, along with any supporting documents (if needed).

### 1. Timely

To be considered timely pursuant to N.J.A.C. 7:27-22.30(c), the Department must receive an administratively complete renewal application at least 12 months prior to expiration of the operating permit. The applicant is encouraged to voluntarily submit the renewal application at least 15 months prior to expiration of the operating permit, so that any deficiencies in the application can be addressed prior to the application due date. Only applications, which are administratively complete by the application deadline, will be eligible for coverage by an application shield.

### 2. Administratively Complete

To be deemed administratively complete pursuant to N.J.A.C. 7:27-22.30(d), an operating permit renewal application must include all information requested in the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package.

### 3. Application Shield

The Department will grant an application shield when a timely and administratively complete application is received pursuant to N.J.A.C. 7:27-22.30(g). An application shield grants the right to operate the facility upon the expiration of its operating permit. If an operating permit has expired, the conditions of the operating permit remain enforceable until the operating permit is reissued. Unless a facility obtained an application shield, the right to operate the facility terminates upon the expiration of its operating permit pursuant to N.J.A.C. 7:27-22.30(i).

### 4. Permit Changes During Renewal Process

Minor changes, such as those that would qualify for a seven-day-notice change or administrative amendment, may be made with the renewal pursuant to N.J.A.C. 7:27-22.30(d). Significant changes, such as those qualifying for a minor or significant modification, must be submitted as a separate permit application. The Department at its discretion may include approval of these proposed changes along with the approval of the renewal application.

### 5. New HAP Reporting Thresholds

Pursuant to N.J.A.C. 7:27-22.30(l), for any operating permit expiring on or after February 12, 2021, HAP emissions from a source operation that equal or exceed the reporting threshold specified in N.J.A.C. 7:27-17.9(a) must be included during this operating permit renewal process. For any instance in which a HAP is being added or revised solely due to a change in the reporting threshold, the HAP(s) may be included by submitting emission calculations as an attachment to the renewal application. Otherwise, the HAP(s) must be included through the submittal of a permit modification application pursuant to N.J.A.C. 7:27-22.23 or N.J.A.C. 7:27-22.24 as applicable. If you are unsure how to proceed, please contact the Department at (609) 633-8248.

### 6. Changes to Insignificant Source Operations

A permittee may, pursuant to N.J.A.C. 7:27-22.21(a), make certain changes to an insignificant source operation, or to the use thereof, without notifying the Department or EPA until the renewal of the operating permit. In the application for the renewal of the operating permit, the permittee shall identify any such changes which affect information in the operating permit. Such changes could include the addition or deletion of insignificant source operations that have occurred during the term of the operating permit. Additions and revisions to existing insignificant source operations shall be made by completing the Insignificant Source Emissions screen in RADIUS, while deletions shall be requested in the Reason for Application screen in RADIUS.

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmission of the renewal application.

## Attachment to the RADIUS Air Operating Permit Renewal Application

### Section 1 Compliance Requirements

#### A. Compliance Assurance Monitoring (CAM) Applicability Determination

EPA developed 40 CFR 64 (Compliance Assurance Monitoring or "CAM") in order to provide reasonable assurance that facilities comply with emission limitations by monitoring the operation and maintenance of their control devices. In general, CAM applies to emission units that meet all of the following conditions:

1. The emission unit is located at a major source for which a Title V permit is required;
2. The emission unit is subject to an emission limitation or standard for a specific contaminant;
3. The emission unit uses a control device to achieve compliance with that specific contaminant's federally enforceable limit or standard;
4. The emission unit has potential pre-control or post-control emissions (of that specific contaminant) of at least 100% of the major source amount (see 40 CFR 64.2 - "Major facility"); and
5. The emission unit is not otherwise exempt from CAM (for exemptions, see 40 CFR 64.2(b)).

To learn more about the CAM program and for guidance on how to prepare a CAM plan, check EPA's website: <https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring>.

After reviewing the information above, check the following boxes as applicable:

- NO**, my facility **does not** have any emission units subject to CAM requirements.
- YES**, my facility **does** have one or more emission units subject to CAM requirements, and
- A CAM plan is provided with this operating permit renewal application.
  - A CAM plan will be submitted during the technical review of this renewal application.

#### B. Health Risk Assessment

1. Consistent with N.J.A.C. 7:27-22.3(cc), the Department will review each operating permit renewal application to ensure that emissions of Hazardous Air Pollutants (HAPs) do not pose a public health risk.
2. After receipt of the renewal application, the Department will notify applicants if a Facility-Wide Risk Assessment must be performed. A plot plan and air dispersion modeling protocol will be required in that case.
3. Previous Facility-Wide Risk Assessment, additions and changes in toxicity values or standards, and changes in the air model and/or the facility's location (in an Environmental Justice area, near a sensitive population etc.) will determine the need for health risk assessment.

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmission of the renewal application.



## Attachment to the RADIUS Air Operating Permit Renewal Application

### C. Acid Rain Program

To learn more about Acid Rain Program, check EPA's website: <https://www.epa.gov/airmarkets/acid-rain-program>.

Check the following boxes as applicable:

- NO**, this facility is **not subject** to the Acid Rain Program, codified at 40 CFR 72.
- YES**, this facility is **subject** to the Acid Rain Program, codified at 40 CFR 72, and
- There have been no changes affecting my facility's Acid Rain Permit and a renewal application is provided with this operating permit renewal application.
  - There have been changes affecting my facility's Acid Rain Permit and a revised/updated application is provided with this operating permit renewal application.

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

Air permit applications requesting air emissions increases are required to include a netting analysis to determine if the resulting net emission increase at the facility constitutes a significant net emission increase pursuant to N.J.A.C. 7:27-18.7. These netting analyses must be kept on site or submitted to the Department consistent with the Department's guidance included in the memo listed under "N.J.A.C. 7:27-18 Netting Analysis" and the "General Procedures for General Operating Permits" on the Department's webpage <http://www.state.nj.us/dep/agpp/permitguide.html> and <http://www.state.nj.us/dep/agpp/gop.html>, respectively. The Department intends to review these analyses at least once in 5 years unless no permit modifications proposing emissions increases were made and no GOPs were obtained during the past 5-year permit term. All netting analyses corresponding to a modification to increase emissions or a GOP must be submitted to the Department. Any netting analyses submitted with a modification application during the 5-year permit term do not need to be submitted again with the permit renewal application.

Check the following boxes as applicable:

- NO**, this facility **has not made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal.
- YES**, this facility **has made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal, and
- One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, were provided with a modification application during the 5-year permit term.
  - One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, are provided with this permit renewal application.
  - One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, will be submitted during the technical review of this permit renewal application.

**Attachment to the RADIUS Air Operating Permit Renewal Application**  
**Section 2**  
**Certification**

No additional certification is required when submitting the operating permit renewal application through NJDEP Online: <http://www.nj.gov/dep/online/>.

Complete the information below when submitting the operating permit renewal application on an electronic storage device, through the mail. Click on the icon on the signature line to add an image of a signature saved on your computer. If you do not have one, print the form out and manually sign on the line.

**Facility PI#:** \_\_\_\_\_ 18940 \_\_\_\_\_

**Facility Name:** \_\_\_\_\_ Woodbridge Energy Center \_\_\_\_\_

**Responsible Official:**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

**Name:** \_\_\_\_\_ Chip Bergeron \_\_\_\_\_ **Signature:** \_\_\_\_\_ *electronically certified* \_\_\_\_\_ **Date:** \_\_\_\_\_

**Individuals with Direct Knowledge:**

I certify under penalty of law that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

**Name:** \_\_\_\_\_ Susann Brown \_\_\_\_\_ **Signature:** \_\_\_\_\_ *electronically certified* \_\_\_\_\_ **Date:** \_\_\_\_\_

**Section Being Certified:** \_\_\_\_\_

**Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Section Being Certified:** \_\_\_\_\_

**Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Section Being Certified:** \_\_\_\_\_

**Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Section Being Certified:** \_\_\_\_\_

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 3  
Summary of 7-Day Notice Changes**

**Instructions**

Complete this form if any 7-day notice changes were submitted to the NJDEP since the approval of the initial operating permit or most recent renewal thereof. With this information, the NJDEP will include the provisions of any eligible 7-day notice changes into the renewed permit.

| <b>No.</b> | <b>Date of 7-Day Notice</b> | <b>Brief Description of Change</b> |
|------------|-----------------------------|------------------------------------|
|            |                             | N/A                                |
|            |                             |                                    |
|            |                             |                                    |
|            |                             |                                    |
|            |                             |                                    |
|            |                             |                                    |
|            |                             |                                    |
|            |                             |                                    |
|            |                             |                                    |

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #       | Applicable Requirement | Monitoring Requirement                                                                  | Recordkeeping Requirement                                             | Submittal/Action Requirement                                                                                | In Compliance? |    |
|------------------------|---------------------|------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------|----|
|                        |                     |                        |                                                                                         |                                                                       |                                                                                                             | Yes            | No |
| U1                     | OS0/<br>Ref#<br>7&8 | CO<=250 ppmvd@15% O2   | Continuous emission monitoring system (CEMS) & stack testing prior to permit expiration | Data acquisition system (DAS)/electronic storage & stack test results | Quarterly excess emission & monitoring system performance reports (EEMPRs).<br>Stack test protocol & report |                |    |
| U1                     | OS0/<br>Ref#<br>9   | VOC<=50 ppmvd@15% O2   | Stack testing prior to permit expiration                                                | Stack test results                                                    | Stack test protocol & report                                                                                |                |    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #         | Applicable Requirement             | Monitoring Requirement                                                                  | Recordkeeping Requirement                                             | Submittal/Action Requirement                                                                                | In Compliance? |    |
|------------------------|-----------------------|------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------|----|
|                        |                       |                                    |                                                                                         |                                                                       |                                                                                                             | Yes            | No |
| U1                     | OS0/<br>Ref#<br>10&11 | NO <sub>x</sub> ≤0.75 lb/MWh (net) | Continuous emission monitoring system (CEMS) & stack testing prior to permit expiration | Data acquisition system (DAS)/electronic storage & stack test results | Quarterly excess emission & monitoring system performance reports (EEMPRs).<br>Stack test protocol & report |                |    |
| U1                     | OS0/<br>Ref#<br>12    | Combustion adjustment              | Continuous emission monitoring system (CEMS) or periodic emissions monitoring           | Data acquisition system (DAS)/electronic storage                      | None                                                                                                        |                |    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #      | Applicable Requirement | Monitoring Requirement | Recordkeeping Requirement | Submittal/Action Requirement | In Compliance?                      |                          |
|------------------------|--------------------|------------------------|------------------------|---------------------------|------------------------------|-------------------------------------|--------------------------|
|                        |                    |                        |                        |                           |                              | Yes                                 | No                       |
| U1                     | OS0/<br>Ref#<br>15 | NOx <=145.9 tpy        | CEMS                   | DAS/electronic storage    | None                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| U1                     | OS0/<br>Ref#<br>16 | CO<=288.1 tpy          | CEMS                   | DAS/electronic storage    | None                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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**Section 4  
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**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #                   | Applicable Requirement                                           | Monitoring Requirement                                                                  | Recordkeeping Requirement                                             | Submittal/Action Requirement                                                                                | In Compliance? |    |
|------------------------|---------------------------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------|----|
|                        |                                 |                                                                  |                                                                                         |                                                                       |                                                                                                             | Yes            | No |
| U1                     | OS0/<br>Ref #<br>63&64          | NOx<=15ppmvd@15%O2 or<br>NOx<=0.43 lb/MWh                        | Stack emission testing                                                                  | Stack test results                                                    | Stack test report                                                                                           |                |    |
| U1                     | OS1,<br>OS5/<br>Ref #<br>5 - 10 | NOx<=2 ppmvd@15% O2;<br>NOx<=0.0073 lb/MMBtu;<br>NOx<=19.8 lb/hr | Continuous emission monitoring system (CEMS) & stack testing prior to permit expiration | Data acquisition system (DAS)/electronic storage & stack test results | Quarterly excess emission & monitoring system performance reports (EEMPRs).<br>Stack test protocol & report |                |    |

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**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #                  | Applicable Requirement                                        | Monitoring Requirement                                                                  | Recordkeeping Requirement                                             | Submittal/Action Requirement                                                                                | In Compliance? |    |
|------------------------|--------------------------------|---------------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------|----|
|                        |                                |                                                               |                                                                                         |                                                                       |                                                                                                             | Yes            | No |
| U1                     | OS1,<br>OS5/<br>Ref #<br>11-16 | CO<=2 ppmvd@15% O2;<br>CO<=0.0045 lb/MMBtu;<br>CO<=12.1 lb/hr | Continuous emission monitoring system (CEMS) & stack testing prior to permit expiration | Data acquisition system (DAS)/electronic storage & stack test results | Quarterly excess emission & monitoring system performance reports (EEMPRs).<br>Stack test protocol & report |                |    |
| U1                     | OS1,<br>OS5/<br>Ref #<br>17-18 | VOC<=2 ppmvd@15% O2;<br>VOC<=6.9 lb/hr                        | Stack testing prior to permit expiration                                                | Stack test results                                                    | Stack test protocol & report                                                                                |                |    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #                 | Applicable Requirement  | Monitoring Requirement                   | Recordkeeping Requirement | Submittal/Action Requirement | In Compliance?                                                                        |    |
|------------------------|-------------------------------|-------------------------|------------------------------------------|---------------------------|------------------------------|---------------------------------------------------------------------------------------|----|
|                        |                               |                         |                                          |                           |                              | Yes                                                                                   | No |
| U1                     | OS1,<br>OS5/<br>Ref#<br>20    | TSP<=8.2 lb/hr          | Stack testing prior to permit expiration | Stack test results        | Stack test protocol & report |    |    |
| U1                     | OS1,<br>OS5/<br>Ref#<br>21-22 | PM-10/PM2.5<=19.1 lb/hr | Stack testing prior to permit expiration | Stack test results        | Stack test protocol & report |  |    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #                 | Applicable Requirement                                           | Monitoring Requirement                                                                  | Recordkeeping Requirement                                             | Submittal/Action Requirement                                                                                | In Compliance? |    |
|------------------------|-------------------------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------|----|
|                        |                               |                                                                  |                                                                                         |                                                                       |                                                                                                             | Yes            | No |
| U1                     | OS2,<br>OS6/<br>Ref#<br>4-9   | NOx<=2 ppmvd@15% O2;<br>NOx<=0.0073 lb/MMBtu;<br>NOx<=16.8 lb/hr | Continuous emission monitoring system (CEMS) & stack testing prior to permit expiration | Data acquisition system (DAS)/electronic storage & stack test results | Quarterly excess emission & monitoring system performance reports (EEMPRs).<br>Stack test protocol & report |                |    |
| U1                     | OS2,<br>OS6/<br>Ref#<br>10-15 | CO<=2 ppmvd@15% O2;<br>CO<=0.0045 lb/MMBtu;<br>CO<=10.2 lb/hr    | Continuous emission monitoring system (CEMS) & stack testing prior to permit expiration | Data acquisition system (DAS)/electronic storage & stack test results | Quarterly excess emission & monitoring system performance reports (EEMPRs).<br>Stack test protocol & report |                |    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #                 | Applicable Requirement                   | Monitoring Requirement                   | Recordkeeping Requirement | Submittal/Action Requirement | In Compliance?                                                                        |    |
|------------------------|-------------------------------|------------------------------------------|------------------------------------------|---------------------------|------------------------------|---------------------------------------------------------------------------------------|----|
|                        |                               |                                          |                                          |                           |                              | Yes                                                                                   | No |
| U1                     | OS2,<br>OS6/<br>Ref#<br>16-17 | VOC<= 1 ppmvd@15% O2;<br>VOC<= 2.9 lb/hr | Stack testing prior to permit expiration | Stack test results        | Stack test protocol & report |    |    |
| U1                     | OS2,<br>OS6/<br>Ref#<br>19    | TSP<= 4.8 lb/hr                          | Stack testing prior to permit expiration | Stack test results        | Stack test protocol & report |  |    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #                 | Applicable Requirement                   | Monitoring Requirement                       | Recordkeeping Requirement                        | Submittal/Action Requirement                                                | In Compliance?                                                                        |    |
|------------------------|-------------------------------|------------------------------------------|----------------------------------------------|--------------------------------------------------|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------|----|
|                        |                               |                                          |                                              |                                                  |                                                                             | Yes                                                                                   | No |
| U1                     | OS2,<br>OS6/<br>Ref#<br>20-21 | PM-10/PM2.5 <= 12.1 lb/hr                | Stack testing prior to permit expiration     | Stack test results                               | Stack test protocol & report                                                |    |    |
| U1                     | OS3,<br>OS7/<br>Ref<br>#2     | CO<=941 lb/hr per turbine during startup | Continuous emission monitoring system (CEMS) | Data acquisition system (DAS)/electronic storage | Quarterly excess emission & monitoring system performance reports (EEMPRs). |  |    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 4  
Summary of the results from Stack Testing and Monitoring**

**Instructions**

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

| Subject Item<br>U / BP | OS /<br>Ref #             | Applicable Requirement                    | Monitoring Requirement                       | Recordkeeping Requirement                        | Submittal/Action Requirement                                                | In Compliance? |    |
|------------------------|---------------------------|-------------------------------------------|----------------------------------------------|--------------------------------------------------|-----------------------------------------------------------------------------|----------------|----|
|                        |                           |                                           |                                              |                                                  |                                                                             | Yes            | No |
| U1                     | OS3,<br>OS7/<br>Ref<br>#3 | Start-up Period <=3.4 hours               | Continuous emission monitoring system (CEMS) | Data acquisition system (DAS)/electronic storage | Quarterly excess emission & monitoring system performance reports (EEMPRs). |                |    |
| U1                     | OS3,<br>OS7/<br>Ref<br>#4 | NOx<=112 lb/hr per turbine during startup | Continuous emission monitoring system (CEMS) | Data acquisition system (DAS)/electronic storage | Quarterly excess emission & monitoring system performance reports (EEMPRs). |                |    |

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## Attachment to the RADIUS Air Operating Permit Renewal Application

### **Section 5** **Compliance Status**

#### **Instructions**

Please read these instructions prior to completing the following form.

1. **Subject Item**: List each subject item from Section D, Compliance Plan and Inventories, of the operating permit in this column. Subject items include Facility (FC), Group (GR), Non-Source Fugitive Emissions (FG), Insignificant Source (IS), Batch Process (BP), and Emission Unit (U). (Operating Scenario and Reference Numbers are required only for Non-Compliance permit requirements. See item 2 below).
2. **Compliance Status**: Provide compliance status for each subject item in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "In Compliance". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and write "Non-Compliance" in the 2<sup>nd</sup> column. (Reference Numbers for each applicable requirement are located in the first column of Facility Specific Requirements, Section D of the permit).
3. **Method Used to Determine Compliance**: Describe how compliance was determined in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "Consistent with all methods listed in monitoring and recordkeeping permit requirements". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and provide specific method used to determine compliance in the 3<sup>rd</sup> column.
4. **Compliance Schedule**: insert a "No" if there are no compliance schedules included in this application to address non-compliance issues for which "Non-Compliance" was inserted in the 2<sup>nd</sup> column. Insert a "Yes" if a compliance schedule is included in this renewal application to address non-compliance issues in the approved permit or non-compliance issues disclosed in this application.

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 5  
Compliance Status**

**Instructions**

Read the instructions on the previous page before completing this form.

| <b>Subject Item</b>        | <b>Compliance Status</b>              | <b>Method Used to Determine Compliance</b>                                              | <b>Is a Compliance Schedule Attached? (Yes/No)</b> |
|----------------------------|---------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>OS / Ref #</b>          | <b>(In Compliance Non-Compliance)</b> |                                                                                         |                                                    |
| <i>Subject Item</i><br>FC  | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>          |                                       |                                                                                         |                                                    |
|                            |                                       |                                                                                         |                                                    |
| <i>Subject Item</i><br>GR5 | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>          |                                       |                                                                                         |                                                    |
|                            |                                       |                                                                                         |                                                    |
| <i>Subject Item</i><br>GR6 | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>          |                                       |                                                                                         |                                                    |
|                            |                                       |                                                                                         |                                                    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 5  
Compliance Status**

**Instructions**

Read the instructions on the previous page before completing this form.

| <b>Subject Item</b>        | <b>Compliance Status</b>              | <b>Method Used to Determine Compliance</b>                                              | <b>Is a Compliance Schedule Attached? (Yes/No)</b> |
|----------------------------|---------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>OS / Ref #</b>          | <b>(In Compliance Non-Compliance)</b> |                                                                                         |                                                    |
| <i>Subject Item</i><br>GR7 | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>          |                                       |                                                                                         |                                                    |
|                            |                                       |                                                                                         |                                                    |
| <i>Subject Item</i><br>U1  | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>          |                                       |                                                                                         |                                                    |
|                            |                                       |                                                                                         |                                                    |
| <i>Subject Item</i><br>U3  | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>          |                                       |                                                                                         |                                                    |
|                            |                                       |                                                                                         |                                                    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 5  
Compliance Status**

**Instructions**

Read the instructions on the previous page before completing this form.

| <b>Subject Item</b>       | <b>Compliance Status</b>              | <b>Method Used to Determine Compliance</b>                                              | <b>Is a Compliance Schedule Attached? (Yes/No)</b> |
|---------------------------|---------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>OS / Ref #</b>         | <b>(In Compliance Non-Compliance)</b> |                                                                                         |                                                    |
| <i>Subject Item</i><br>U4 | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>         |                                       |                                                                                         |                                                    |
|                           |                                       |                                                                                         |                                                    |
| <i>Subject Item</i><br>U5 | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>         |                                       |                                                                                         |                                                    |
|                           |                                       |                                                                                         |                                                    |
| <i>Subject Item</i><br>U6 | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>         |                                       |                                                                                         |                                                    |
|                           |                                       |                                                                                         |                                                    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 5  
Compliance Status**

**Instructions**

Read the instructions on the previous page before completing this form.

| <b>Subject Item</b>     | <b>Compliance Status</b>              | <b>Method Used to Determine Compliance</b>                                              | <b>Is a Compliance Schedule Attached? (Yes/No)</b> |
|-------------------------|---------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------|
| <b>OS / Ref #</b>       | <b>(In Compliance Non-Compliance)</b> |                                                                                         |                                                    |
| <i>Subject Item IS1</i> | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>       |                                       |                                                                                         |                                                    |
|                         |                                       |                                                                                         |                                                    |
| <i>Subject Item IS2</i> | In Compliance                         | Consistent with all methods listed in monitoring and record keeping permit requirements | No                                                 |
| <i>OS / Ref #</i>       |                                       |                                                                                         |                                                    |
|                         |                                       |                                                                                         |                                                    |
| <i>Subject Item</i>     |                                       |                                                                                         |                                                    |
| <i>OS / Ref #</i>       |                                       |                                                                                         |                                                    |
|                         |                                       |                                                                                         |                                                    |

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**Attachment to the RADIUS Air Operating Permit Renewal Application**

**Section 5  
Compliance Schedules**

**Instructions**

Complete this form if the permit included any compliance schedules (Section D of the permit) or if there are any non-compliance issues at the time of completing this application form. Check the appropriate box to indicate whether the compliance schedule has been updated, removed, or added.

| Subject Item        | Requirement | Compliance Schedule | Compliance Schedule |         |       |
|---------------------|-------------|---------------------|---------------------|---------|-------|
|                     |             |                     | Updated             | Removed | Added |
| <i>Subject Item</i> | N/A         |                     |                     |         |       |
|                     |             |                     |                     |         |       |
| <i>OS / Ref #</i>   |             |                     |                     |         |       |
|                     |             |                     |                     |         |       |
| <i>Subject Item</i> |             |                     |                     |         |       |
|                     |             |                     |                     |         |       |
| <i>OS / Ref #</i>   |             |                     |                     |         |       |
|                     |             |                     |                     |         |       |
| <i>Subject Item</i> |             |                     |                     |         |       |
|                     |             |                     |                     |         |       |
| <i>OS / Ref #</i>   |             |                     |                     |         |       |
|                     |             |                     |                     |         |       |

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## **ATTACHMENT 3**

### **HAP Emission Calculations**

**Woodbridge Energy Center  
Potential HAP Emissions Summary**

| Equipment Parameters:          | Heat Input (mmBtu/hr) | Operation (hrs/year) | Number of Units |
|--------------------------------|-----------------------|----------------------|-----------------|
| Combustion Turbine - Gas (max) | 2,307                 | 8,760                | 2               |
| Duct Burner                    | 500                   | 685                  | 2               |
| Auxiliary Boiler               | 91.6                  | 2,000                | 1               |
| Emergency Diesel Generator     | 13.5                  | 100                  | 1               |
| Diesel Fire Pump               | 2.1                   | 100                  | 1               |

| Fuel Properties:                      |         |           |
|---------------------------------------|---------|-----------|
| Natural Gas Heat Content              | 1,020   | Btu/scf   |
| Natural Gas Sulfur Content-Annual Avg | 0.00    | gr/100scf |
| Distillate Oil Density                | 7.1     | lb/gal    |
| Distillate Oil Sulfur Content         | 0.0015% | weight %  |

| Hazardous Air Pollutants (HAPs)           | New Combustion Turbines (CT) |                   | Duct Burners (DB)  |                   | CT+DB (each)               | Auxiliary Boiler   |            |                            | Emergency Generator |            |                            | Fire Water Pump |            |                            | Facility Total | NJDEP Reporting Threshold |
|-------------------------------------------|------------------------------|-------------------|--------------------|-------------------|----------------------------|--------------------|------------|----------------------------|---------------------|------------|----------------------------|-----------------|------------|----------------------------|----------------|---------------------------|
|                                           | Natural Gas Firing           |                   | Natural Gas Firing |                   |                            | Natural Gas Firing |            |                            | Fuel Oil Firing     |            |                            | Fuel Oil Firing |            |                            |                |                           |
|                                           | EF Basis (1)                 | Max Hourly Per CT | EF Basis (2)       | Max Hourly Per DB | Potential Annual Emissions | EF Basis (2)       | Max Hourly | Potential Annual Emissions | EF Basis (3)        | Max Hourly | Potential Annual Emissions | EF Basis (3)    | Max Hourly | Potential Annual Emissions | lb/yr          | lb/yr                     |
|                                           | lb/MMBtu                     | lb/hr             | lb/MMCF            | lb/hr             | lb/yr                      | lb/MMCF            | lb/hr      | lb/yr                      | lb/MMBtu            | lb/hr      | lb/yr                      | lb/MMBtu        | lb/hr      | lb/yr                      | lb/yr          | lb/yr                     |
| <b>VOC-HAP</b>                            |                              |                   |                    |                   |                            |                    |            |                            |                     |            |                            |                 |            |                            |                |                           |
| Acetaldehyde                              | 4.00E-05                     | 9.23E-02          |                    |                   | 808.27                     |                    |            |                            | 7.67E-04            | 1.03E-02   | 1.0341                     | 7.67E-04        | 1.62E-03   | 0.16207                    | 1616.54938     | 21                        |
| Acrolein                                  | 6.40E-06                     | 1.48E-02          |                    |                   | 129.32                     |                    |            |                            | 9.25E-05            | 1.25E-03   | 0.1247                     | 9.25E-05        | 1.95E-04   | 0.01955                    | 258.64790      | 1                         |
| Benzene                                   | 1.20E-05                     | 2.77E-02          | 2.10E-03           | 1.03E-03          | 243.19                     | 2.10E-03           | 1.89E-04   | 3.77E-01                   | 9.33E-04            | 1.26E-02   | 1.2580                     | 9.33E-04        | 1.97E-03   | 0.19714                    | 487.63306      | 6                         |
| 1,3-Butadiene                             | 4.30E-07                     | 9.92E-04          |                    |                   | 8.69                       |                    |            |                            |                     |            |                            |                 |            |                            | 17.37791       | 1.5                       |
| Dichlorobenzene                           |                              |                   | 1.20E-03           | 5.88E-04          | 0.40                       | 1.20E-03           | 1.08E-04   | 2.16E-01                   |                     |            |                            |                 |            |                            |                | 4                         |
| Ethylbenzene                              | 3.20E-05                     | 7.38E-02          |                    |                   | 646.62                     |                    |            |                            |                     |            |                            |                 |            |                            | 1293.23950     | 19                        |
| Formaldehyde (see note #1)                | 1.30E-04                     | 3.00E-01          | 7.50E-02           | 3.68E-02          | 2,652.08                   | 7.50E-02           | 6.74E-03   | 1.35E+01                   | 1.18E-03            | 1.59E-02   | 1.5910                     | 1.18E-03        | 2.49E-03   | 0.24933                    | 5317.62371     | 3.5                       |
| Hexane                                    |                              |                   | 1.80E+00           | 8.82E-01          | 604.41                     | 1.80E+00           | 1.62E-01   | 3.23E+02                   |                     |            |                            |                 |            |                            |                | 2,000                     |
| Naphthalene                               | 1.30E-06                     | 3.00E-03          | 6.10E-04           | 2.99E-04          | 26.47                      | 6.10E-04           | 5.48E-05   | 1.10E-01                   | 8.48E-05            | 1.14E-03   | 0.1143                     | 8.48E-05        | 1.79E-04   | 0.01792                    | 52.94751       | 1.4                       |
| Propylene Oxide                           | 2.90E-05                     | 6.69E-02          |                    |                   | 586.00                     |                    |            |                            |                     |            |                            |                 |            |                            | 1171.99830     | 12                        |
| Toluene                                   | 1.30E-04                     | 3.00E-01          | 3.40E-03           | 1.67E-03          | 2,628.03                   | 3.40E-03           | 3.05E-04   | 6.11E-01                   | 4.09E-04            | 5.51E-03   | 0.5514                     | 4.09E-04        | 8.64E-04   | 0.08642                    | 5256.06881     | 2,000                     |
| Xylenes                                   | 6.40E-05                     | 1.48E-01          |                    |                   | 1,293.24                   |                    |            |                            | 2.85E-04            | 3.84E-03   | 0.3843                     | 2.85E-04        | 6.02E-04   | 0.06022                    |                | 2,000                     |
| <b>Polycyclic Organic Compounds (POM)</b> |                              |                   |                    |                   |                            |                    |            |                            |                     |            |                            |                 |            |                            |                |                           |
| Acenaphthene                              | 8.50E-08                     | 1.96E-04          | 1.80E-06           | 8.82E-07          | 1.72                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   | 1.42E-06            | 1.91E-05   | 0.0019                     | 1.42E-06        | 3.00E-06   | 0.00030                    |                | 2                         |
| Acenaphthylene                            | 8.53E-08                     | 1.97E-04          | 1.80E-06           | 8.82E-07          | 1.72                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   | 5.06E-06            | 6.82E-05   | 0.0068                     | 5.06E-06        | 1.07E-05   | 0.00107                    |                | 2                         |
| Anthracene                                | 1.14E-07                     | 2.63E-04          | 2.40E-06           | 1.18E-06          | 2.30                       | 2.40E-06           | 2.16E-07   | 4.31E-04                   | 1.87E-06            | 2.52E-05   | 0.0025                     | 1.87E-06        | 3.95E-06   | 0.00040                    | 4.60878        | 2                         |
| Benz(a)anthracene                         | 8.53E-08                     | 1.97E-04          | 1.80E-06           | 8.82E-07          | 1.72                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   | 1.68E-06            | 2.27E-05   | 0.0023                     | 1.68E-06        | 3.55E-06   | 0.00035                    | 3.44850        | 0.4                       |
| Benzo(a)pyrene                            | 5.69E-08                     | 1.31E-04          | 1.20E-06           | 5.88E-07          | 1.15                       | 1.20E-06           | 1.08E-07   | 2.16E-04                   | 1.88E-07            | 2.53E-06   | 0.0003                     | 1.88E-07        | 3.97E-07   | 0.00004                    | 2.30035        | 0.04                      |
| Benzo(b)fluoranthene                      | 8.53E-08                     | 1.97E-04          | 1.80E-06           | 8.82E-07          | 1.72                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   | 9.91E-08            | 1.34E-06   | 0.0001                     | 9.91E-08        | 2.09E-07   | 0.00002                    | 3.44850        | 0.4                       |
| Benzo(g,h,i)perylene                      | 5.69E-08                     | 1.31E-04          | 1.20E-06           | 5.88E-07          | 1.15                       | 1.20E-06           | 1.08E-07   | 2.16E-04                   | 4.89E-07            | 6.59E-06   | 0.0007                     | 4.89E-07        | 1.03E-06   | 0.00010                    |                | 2                         |
| Benzo(k)fluoranthene                      | 8.53E-08                     | 1.97E-04          | 1.80E-06           | 8.82E-07          | 1.72                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   | 1.55E-07            | 2.09E-06   | 0.0002                     | 1.55E-07        | 3.28E-07   | 0.00003                    |                | 2                         |
| Chrysene                                  | 8.53E-08                     | 1.97E-04          | 1.80E-06           | 8.82E-07          | 1.72                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   | 3.53E-07            | 4.76E-06   | 0.0005                     | 3.53E-07        | 7.46E-07   | 0.00007                    |                | 2                         |
| Dibenzo(a,h)anthracene                    | 5.69E-08                     | 1.31E-04          | 1.20E-06           | 5.88E-07          | 1.15                       | 1.20E-06           | 1.08E-07   | 2.16E-04                   | 5.83E-07            | 7.86E-06   | 0.0008                     | 5.83E-07        | 1.23E-06   | 0.00012                    | 2.30035        | 0.04                      |
| 7,12-Dimethylbenz(a)anthracene            |                              |                   | 1.60E-05           | 7.84E-06          | 0.01                       | 1.60E-05           | 1.44E-06   | 2.87E-03                   |                     |            |                            |                 |            |                            | 0.01362        | 0.0007                    |
| Fluoranthene                              | 1.42E-07                     | 3.28E-04          | 3.00E-06           | 1.47E-06          | 2.87                       | 3.00E-06           | 2.69E-07   | 5.39E-04                   | 7.61E-06            | 1.03E-04   | 0.0103                     | 7.61E-06        | 1.61E-05   | 0.00161                    | 5.74076        | 2                         |
| Fluorene                                  | 1.33E-07                     | 3.07E-04          | 2.80E-06           | 1.37E-06          | 2.69                       | 2.80E-06           | 2.51E-07   | 5.03E-04                   | 2.92E-05            | 3.94E-04   | 0.0394                     | 2.92E-05        | 6.17E-05   | 0.00617                    | 5.37691        | 2                         |
| 3-Methylchloranthrene                     |                              |                   | 1.80E-06           | 8.82E-07          | 0.00                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   |                     |            |                            |                 |            |                            |                | 2                         |
| 2-Methylnaphthalene                       |                              |                   | 2.40E-05           | 1.18E-05          | 0.01                       | 2.40E-05           | 2.16E-06   | 4.31E-03                   |                     |            |                            |                 |            |                            |                | 2                         |
| Indeno(1,2,3-cd)pyrene                    | 8.53E-08                     | 1.97E-04          | 1.80E-06           | 8.82E-07          | 1.72                       | 1.80E-06           | 1.62E-07   | 3.23E-04                   | 3.75E-07            | 5.06E-06   | 0.0005                     | 3.75E-07        | 7.92E-07   | 0.00008                    | 3.44850        | 0.4                       |
| Phenanthrene                              | 8.06E-07                     | 1.86E-03          | 1.70E-05           | 8.33E-06          | 16.29                      | 1.70E-05           | 1.53E-06   | 3.05E-03                   | 2.94E-05            | 3.96E-04   | 0.0396                     | 2.94E-05        | 6.21E-05   | 0.00621                    | 32.58489       | 2                         |
| Pyrene                                    | 2.37E-07                     | 5.47E-04          | 5.00E-06           | 2.45E-06          | 4.79                       | 5.00E-06           | 4.49E-07   | 8.98E-04                   | 4.78E-06            | 6.44E-05   | 0.0064                     | 4.78E-06        | 1.01E-05   | 0.00101                    | 9.58141        | 2                         |
| Total POM                                 | 2.2E-06                      | 5.1E-03           | 8.82E-05           | 4.32E-05          | 44.47                      | 8.82E-05           | 7.92E-06   | 1.58E-02                   | 8.33E-05            | 1.12E-03   | 0.1123                     | 8.33E-05        | 1.76E-04   | 0.01759                    | 88.94924       | 2                         |
| <b>Metal-HAPs</b>                         |                              |                   |                    |                   |                            |                    |            |                            |                     |            |                            |                 |            |                            |                |                           |
| Arsenic                                   | 1.96E-07                     | 4.52E-04          | 2.00E-04           | 9.80E-05          | 4.03                       | 2.00E-04           | 1.80E-05   | 3.59E-02                   | 1.10E-05            | 1.48E-04   | 0.0148                     | 1.10E-05        | 2.32E-05   | 0.00232                    | 8.10933        | 0.01                      |
| Beryllium                                 | 1.18E-08                     | 2.71E-05          | 1.20E-05           | 5.88E-06          | 0.24                       | 1.20E-05           | 1.08E-06   | 2.16E-03                   | 3.10E-07            | 4.18E-06   | 0.0004                     | 3.10E-07        | 6.55E-07   | 0.00007                    | 0.48351        | 0.02                      |
| Cadmium                                   | 1.08E-06                     | 2.49E-03          | 1.10E-03           | 5.39E-04          | 22.16                      | 1.10E-03           | 9.88E-05   | 1.98E-01                   | 4.80E-06            | 6.47E-05   | 0.0065                     | 4.80E-06        | 1.01E-05   | 0.00101                    | 44.51973       | 0.01                      |
| Chromium                                  | 1.37E-06                     | 3.17E-03          | 1.40E-03           | 6.86E-04          | 28.21                      | 1.40E-03           | 1.26E-04   | 2.51E-01                   | 1.10E-05            | 1.48E-04   | 0.0148                     | 1.10E-05        | 2.32E-05   | 0.00232                    |                | 1,000                     |
| Lead                                      | 4.90E-07                     | 1.13E-03          | 5.00E-04           | 2.45E-04          | 10.07                      | 5.00E-04           | 4.49E-05   | 8.98E-02                   | 1.40E-05            | 1.89E-04   | 0.0189                     | 1.40E-05        | 2.96E-05   | 0.00296                    | 20.14644       | 2                         |
| Manganese                                 | 3.73E-07                     | 8.59E-04          | 3.80E-04           | 1.86E-04          | 7.66                       | 3.80E-04           | 3.41E-05   | 6.83E-02                   | 7.90E-04            | 1.07E-02   | 1.0651                     | 7.90E-04        | 1.67E-03   | 0.16693                    | 16.37644       | 0.6                       |
| Mercury                                   | 2.55E-07                     | 5.88E-04          | 2.60E-04           | 1.27E-04          | 5.24                       | 2.60E-04           | 2.33E-05   | 4.67E-02                   | 1.20E-06            | 1.62E-05   | 0.0016                     | 1.20E-06        | 2.54E-06   | 0.00025                    | 10.47615       | 2                         |
| Nickel                                    | 2.06E-06                     | 4.75E-03          | 2.10E-03           | 1.03E-03          | 42.31                      | 2.10E-03           | 1.89E-04   | 3.77E-01                   | 4.60E-06            | 6.20E-05   | 0.0062                     | 4.60E-06        | 9.72E-06   | 0.00097                    | 84.61504       | 0.6                       |
| Selenium                                  | 2.35E-08                     | 5.43E-05          | 2.40E-05           | 1.18E-05          | 0.48                       | 2.40E-05           | 2.16E-06   | 4.31E-03                   | 2.50E-05            | 3.37E-04   | 0.0337                     | 2.50E-05        | 5.28E-05   | 0.00528                    |                | 925                       |

**Notes:**

- Emission Factor References -
- U.S. EPA AP-42 Emission Factor Guidance Document, Section 3.1 (Stationary Gas Turbines), Table 3.1-3. Note metal HAPs assumed to be equivalent to natural gas firing of external combustion sources (see Ref #3).  
Natural gas formaldehyde emission factor from GE formaldehyde emissions test results for GE 7FA dated August 1, 2001.
  - U.S. EPA AP-42 Emission Factor Guidance Document, Section 1.4 (Natural Gas Combustion), Tables 1.4-2, 1.4-3, and 1.4-4.
  - U.S. EPA AP-42 Emission Factor Guidance Document, Section 3.3 (Diesel Industrial Engines), Table 3.3-2. Note metal HAPs assumed to be equivalent to distillate fuel oil firing of combustion turbines (see Ref #2).

**ATTACHMENT 4**

**Acid Rain Permit Renewal Application**



**STEP 3****Read the standard requirements.****Permit Requirements**

- (1) The designated representative of each affected source and each affected unit at the source shall:
  - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
  - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
  - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
  - (ii) Have an Acid Rain Permit.

**Monitoring Requirements**

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

**Sulfur Dioxide Requirements**

- (1) The owners and operators of each source and each affected unit at the source shall:
  - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
  - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
  - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
  - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

**Nitrogen Oxides Requirements**

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.



**STEP 3, Cont'd.****Excess Emissions Requirements**

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
  - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
  - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

**Recordkeeping and Reporting Requirements**

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
  - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
  - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
  - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

**Liability**

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

**STEP 3, Cont'd.**

**Effect on Other Authorities**

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:


- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

**STEP 4**

**Certification**

**Read the certification statement, sign, and date.**

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

|           |                                                                                     |                |
|-----------|-------------------------------------------------------------------------------------|----------------|
| Name      | Albert W. Bergeron, Jr.                                                             |                |
| Signature |  | Date 6/11/2021 |