



State of New Jersey

Department of Environmental Protection

Air Quality, Energy and Sustainability

Division of Air Quality

Bureau of Stationary Sources

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ACTING COMMISSIONER

RESPONSE TO COMMENTS DOCUMENT

for

An Air Pollution Control Operating Permit Renewal Application (Title V)

for

LANDFILL SITE 1E

100 Baler Blvd

North Arlington, NJ 07031

Program Interest (PI) Number: 02844

Permit Activity Number: BOP190001

Eleonora Kats

2/3/21

Joel Leon

2/9/21

Eleonora Kats
Environmental
Engineer 3
Operating Permits

Date

Joel Leon
Section Chief
Operating Permits

Date

Written comments on the draft approval were received from the USEPA. No other comments were received. Response to the comments received are addressed in this document.

COMMENT: 1

Aside for designating emission unit U2, a "Transfer Station" (permit at page 22 of 26), neither the permit nor the SOB provides information about the specific activities that are undertaken at U2. At Ref. # 8, page 24 of 26, the permit states "The Facility is allowed to process (receive and ship) only Type 10, 13, 13C, 23, 25 and 27 waste types as defined in NJAC 7:26-2.13." This description is not sufficient in informing on the type of activities that are taking place at U2. The SOB should provide details on the nature of the "process" activities that take place at the Transfer Station. Please provide clarification in either the SOB or the permit about the "process" activities that take place at the facility under emission unit U2.

Still concerning emission unit U2, on page 26, Ref. # 1 states "Particulates Control Efficiency of the filter is 99%." Note that References 1 through 7 (pages 22 and 23) suggest that there are significant emissions of particulates, potentially affecting visibility (Ref. #1, page 22). The SOB or the permit should, therefore, provide information that explains the nature of those activities that are performed at U2, causing the facility to be concerned with potentially significant particulates emissions.

RESPONSE: 1

In response to comment, U2 OS Summary Ref. 8 was updated to include the following: The Solid Waste Transfer Station operates independent of the Landfill Site 1-E, and solid waste is disposed at alternate disposal facilities. All operations occur within an enclosed solid waste building, where waste is unloaded from several collection vehicles into large transfer trailers or intermodal containers. The SAJO Transport Inc. Solid Waste Transfer Station is authorized under Solid Waste Permit, PI 203153 Activity Number TRP200001.

SOB was updated as follows: Loading/unloading of municipal solid waste at solid waste transfer station has potential to generate particulates emissions and odors. To control Particulates emissions, the transfer building is equipped with the six particulate control devices. To control odors, transfer station is equipped with carbon adsorption control device.

COMMENT: 2

Further, concerning emission unit U2, on page 26 of 26, the permit references a carbon media (Refs. # 4 & 5) that is used in the adsorption of odors. Therefore, in addition to the particulates emissions referenced above, volatile organic emissions seem to also be a concern for those various activities taking place under U2. Please provide clarification in the SOB about those potential sources of odors, and the rationale for operating a carbon adsorption control device at U2.

RESPONSE: 2

In response to comment, SOB was updated as follows:
Loading/unloading of municipal solid waste at solid waste transfer station has potential to generate particulates emissions and odors. To control Particulates emissions, the transfer building is

equipped with the six particulate control devices. To control odors, transfer station is equipped with carbon adsorption control device.

COMMENT: 3

Although the landfill is closed and is no longer subject to NSPS, its Gas Collection System is still being operated and venting to an open flare. For the Gas Collection System to operate, there must be a gas mover equipment (i.e., blower, compressor) that is being used to transport landfill gas to the flare. The SOB is mute on this matter. Please provide details in the SOB explaining how the gas is being collected and transported to the flare and, more importantly, specify the nature of any equipment that is used for that purpose.

RESPONSE: 3

In response to comment, SOB was updated as follows: An active Gas Collection system is equipped with an electrical centrifugal blower (Hoffman Model No. 76103A5), located at the flare station that applies a vacuum to the piping network that connects vertical extraction wells drilled into the waste mass. The blower then directs the collected gas to the open flare for combustion.

COMMENT: 4

On page 12 of 26, at Ref.# 2, under Monitoring Requirements, the permit states:

"... The owner or operator shall inspect the flare before May of each year to verify that the flare continues to be operated in accordance with the manufacturer's specification for the operation of the flare.[N.J.A.C.7:27-16.16(c)]."

Note that the correct citation should be N.J.A.C.7:27-16.13(c), not N.J.A.C.7:27-16.16(c). Also, at Ref. # 2, page 12 of 26, under Monitoring Requirement, the correct citation is N.J.A.C.7:27-16.13(c), not N.J.A.C.7:27-16.16(c). Please make corrections accordingly.

RESPONSE: 4

Correction made as requested at U1 OS Summary, Ref.# 2, under Monitoring Requirements. The permit condition's correct citation will read N.J.A.C.7:27-16.13(c), not N.J.A.C.7:27-16.16(c).

COMMENT: 5

For Emission Unit U1 (Open Flare combusting untreated LFG) and Operating Scenario OS Summary, on page 12 of 26, the permit states a VOC destruction and removal efficiency of 95%, and the following corresponding Monitoring and Recordkeeping requirements.

Monitoring Requirement: Other: Compliance with the applicable requirement shall be determined by annual inspections. The results of the annual inspection and necessary adjustments to the flare will ensure that the minimum VOC destruction and removal efficiency requirements are met. The owner or operator shall inspect the flare before May of each year to verify that the flare continues to be operated in accordance with the manufacturer's specification for the operation of the flare.[N.J.A.C.7:27-16.13(c)].

Recordkeeping Requirement: Recordkeeping by documenting the results of the annual inspections. The owner or operator shall record the following for each inspection: date of

inspection, name of person conducting inspection, entry indicating which flare was inspected, any changes or adjustments made to flare as a result of inspection and a statement that the flare is currently being operated in compliance with manufacturer's specifications.[N.J.A.C. 7:27-16.13(c)].

Still, referencing Emission Unit U1 on page 17 of 26, for Open Flare combusting untreated LFG, at Ref. # 3, with a 95% VOC destruction efficiency, the permit states [N.J.A.C. 7:27-16.13(a)] as the applicable requirement, yet, this time states "None" for the corresponding Monitoring Requirement and Recordkeeping Requirement columns. In actuality, according to NJ's Subchapter16 rules, the corresponding monitoring and recordkeeping requirements for N.J.A.C. 7:27-16.13(a) are stated at N.J.A.C. 7:27-16.13(c) and are exactly as described above.

Considering that at both references, that is Ref. # 3 of page 17 of 26, and Ref.# 2 of page 12 of 26, we are dealing with the very same emission unit, namely U1, burning the same gas (untreated landfill gas), operating under the same design parameters (95% VOC destruction efficiency), and using the same citation as an applicable requirement, namely N.J.A.C. 7:27-16.13(a), in this instance it cannot be justified to allow the permit to state "None" under monitoring and recordkeeping requirements at Ref. # 3 of page 17 of 26, as we would allow in other permits. Therefore, on page 17 of 26, at Ref. # 3, the permit should replace the "None" that is presently stated under the Monitoring Requirement and Recordkeeping Requirement columns with the same language noted above, as found at Ref. #2, on page 12 of 26, for the Monitoring Requirement and Recordkeeping Requirement columns.

RESPONSE: 5

The Department agreed with the above statement. Monitoring and recordkeeping requirements at U1, OS2, Ref. #3 (page 17 of 26) were made identical to monitoring and recordkeeping requirements at U1 OS Summary, Ref. #2, as requested.