

# STATEMENT OF BASIS for Stafford Township Landfill

## TITLE V OPERATING PERMIT SIGNIFICANT MODIFICATION

Program Interest (PI): 79222 / Permit Activity Number: BOP210001

### I. FACILITY INFORMATION

Stafford Township Landfill is located at Stafford Township Business Park, Recovery and Hay Roads, Manahawkin, NJ 08050-2701, Ocean County and consists of a landfill. The facility is owned by and is operated by Stafford Township.

The facility is classified as a major facility based on its potential to emit 566 tons per year of methane.

This permit does not contain any hazardous air pollutants.

### II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

### III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility is a landfill with a passive vent system.

This is a Permit Modification and includes the following changes:

- Removes the H<sub>2</sub>S quarterly monitoring requirement from Emission Unit U1 OS Summary Ref. #2. The facility has demonstrated compliance with the H<sub>2</sub>S limit in each quarter of 2020 and is removing the quarterly monitoring requirement as allowed by the permit.

There are no proposed changes to air contaminant allowable emission rates.

### IV. CASE-BY-CASE DETERMINATIONS

No case-by-case determinations were required for this modification.

### V. EMISSION OFFSET REQUIREMENTS

This modification is not subject to Emission Offset requirements.

### VI. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

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For the landfill in Emission Unit U1, the facility samples and analyzes the landfill gas annually for vinyl chloride, ethyl benzene, toluene, benzene, methane, and H<sub>2</sub>S.

3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
- Equipment size and capacity limitations,
  - Subject equipment being permitted at the maximum rated capacity,
  - There is no specific state or Federal standard that applies to this piece of equipment,
  - Not a pollutant of concern for this piece of equipment,
  - Agreements with EPA on the frequency of testing and monitoring for combustion sources.

#### **VII. APPLICABLE STATE AND FEDERAL RULES**

This modification is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

The Greenhouse Gas (GHG) emissions from this facility are 11,886 TPY CO<sub>2</sub>e and there is no GHG emissions increase. This modification is not subject to PSD rules at 40 CFR 52.21.

#### **VIII. FACILITY'S COMPLIANCE STATUS**

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Prior to the expiration of the Operating Permit's five-year term, the facility will be required to apply for a renewal, at which time the Department will evaluate the facility and issue a public notice with its findings.

#### **IX. EXEMPT ACTIVITIES**

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

FACILITY NAME (FACILITY ID NUMBER)  
BOP050001

Activity Number assigned by the Department

**New Jersey Department of Environmental Protection  
Facility Specific Requirements**

Emission Unit Number assigned by the Facility

Brief description of emission unit

**Emission Unit:** U40 Sewage Sludge Incinerators  
**Operating Scenario:** OS Summary

**OR OS2 Fluidized Bed Incinerator**

OS Summary lists all rules and requirements that apply to an emission unit. An emission unit may contain one or more pieces of equipment and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules and requirements that apply to a scenario. An operating scenario represents various ways (or scenarios) a piece of equipment is permitted to operate.

Item Number

Description of applicable requirement

Monitoring method to ensure compliance

Recordkeeping to show facility's compliance

Actions and submittals required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for applicable requirement

Rule citation for monitoring requirement

Rule citation for recordkeeping requirement

Rule citation for submittal/ action requirement

**Explanation Sheet for Facility Specific Requirements**