

Environmental Justice Public Meeting Comment Summary
Hosted by: Somerset Raritan Valley Sewerage Authority
Meeting Date/Time: December 7, 2023 at 6:00 PM EST

Meeting Purpose: Discuss the facility’s 2018 Title V Operating Permit (TVOP) Renewal Application. A public meeting is required pursuant to C.13:1D-160 of the New Jersey Environmental Justice Law and Administrative Order 2021-25.

Summary of Attendees:

- Somerset Raritan Valley Sewerage Authority (SRVSA)
 - Ronald Anastasio, P.E.; Executive Director, SRVSA; Ronald.Anastasio@SRVSA.org
 - Eleanor Hoffman, P.E.; Regulatory Compliance Engineer, SRVSA; Ellie.Hoffman@srvsa.org
 - Christine Chinofsky; Managing Consultant, ALL4 LLC; cchinofsky@all4inc.com
- New Jersey Department of Environmental Protection (NJDEP)
 - Taylor Groskorth-Flynn; NJDEP; Taylor.Groskorth-Flynn@dep.nj.gov
- Members of the Public:
 - X Braithwaite; Environmental Justice Organizer, Clean Water Action; xbraithwaite@cleanwater.org; 419 Jelliff Avenue, Newark, NJ 07112

Summary of Verbal Comments Received During the Meeting:

Comment No.	Meeting Recording Time Stamp (Min:Sec)	Commenter	Comment Summary	SRVSA Response
1	17:45	X Braithwaite	Commenter requested a 30-day extension on the public comment period.	SRVSA granted the 30-day extension. The public comment period was extended through February 5, 2024, instead of January 6, 2024.
2	18:45	X Braithwaite	Commenter asked whether poly-aromatic hydrocarbons were addressed in the application and indicated that this comment was also in the meeting chat.	Benzo(a)pyrene was addressed at the time of the application submission.
3	19:50	X Braithwaite	Commenter asked whether SRVSA is proposing to add a free-bed incinerator as part of the application.	SRVSA is renewing the permit for an existing fluidized bed incinerator; SRVSA is not proposing to add any equipment as part of this application.

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4	19:50	X Braithwaite	Commenter asked whether SRVSA has tracked emissions from the incinerator over the past 5 years.	SRVSA prepares Annual Emission Statements, in accordance with NJDEP regulations. The Emission Statements can be accessed online through NJDEP's dataminer website (https://njems.nj.gov/DataMiner). Select the search option 'Search by Category', from the Report Category dropdown select 'Air Quality Permitting and Reporting' and click submit. Select the second link from the list – 'Air Emission Statement Annual Report by PI number'. Enter the year you would like to see data for and SRVSA's PI number, 35857, and click submit. Please note that at the top of the page there is an option to export the results as pdf or excel file.
5	20:30	X Braithwaite	Commenter asked whether SRVSA has done any community outreach to notify the public of the permit renewal application.	SRVSA published public notices regarding the hearing in two newspapers, in both English and Spanish. Additionally, the meeting information was available online on SRVSA's website as well as the NJDEP's environmental justice website, and in print at the Bridgewater branch of the Somerset County Library.

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6	21:40	X Braithwaite	Commenter asked about the conditions of workers at the facility, whether conditions are factory-like or do workers sit down all day.	<p>Facility workers generally perform a combination of physical activities and desk responsibilities, including:</p> <ul style="list-style-type: none"> • Operation of treatment facilities and equipment • Monitoring of process equipment, gauges, meters and control devices • Operation of valves and gates to maintain proper operation of the facilities • Starting and stopping of pumps, motors and equipment • Maintaining daily logs and records and readings • Sampling and process tests • Housekeeping of facilities and grounds • Maintenance of facilities and equipment including preventative maintenance and repairs.
7	22:00	X Braithwaite	Commenter stated that employees work with a lot of toxic chemicals and asked whether SRVSA keeps health data on its workers.	Employees receive annual physicals to monitor their health at no cost to the employees. After those physicals SRVSA receives a “fit for duty” confirmation record, which is maintained.
8	22:20	X Braithwaite	Commenter asked whether SRVSA would be willing to have a follow-up conversation with the public in Somerset County.	SRVSA has exceeded the public notice and comment requirements for this project and does not plan to hold any additional public meetings. SRVSA has addressed all comments, both verbal and written, and has extended the public comment period as requested.

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9	23:00	X Braithwaite	Commenter asked what topics are required to be addressed during the public meeting under Administrative Order 2021-25.	<p>For questions regarding the Environmental Justice Law, the Administrative Order, and the Environmental Justice Rules please see NJDEP's Environmental Justice website at: https://dep.nj.gov/ej/law/. The purpose of the public hearing is to ensure meaningful participation from members of the overburdened community. SRVSA is required to hold a public hearing in the overburdened community to present the proposed project. SRVSA hosted the meeting both in person and virtually to maximize accessibility. Public notice for the hearing was published in two newspapers in both English and Spanish, as well on SRVSA's and NJDEP's websites, and at the Bridgewater Branch of the Somerset County Library. The purpose of the hearing is to inform the community of the project and to receive any questions or comments related to the project, which are to be responded to after the close of the public comment period. The public comment period for this project ended February 5, 2024.</p>

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10	24:10	X Braithwaite	Commenter asked where the community can access data collected by the facility.	SRVSA prepares Annual Emission Statements, in accordance with NJDEP regulations, which can be accessed through NJDEP's dataminer website (see Comment 4 for instructions on accessing dataminer). As SRVSA is a public entity, interested persons can also file a request pursuant to the Open Public Records Act for data collected by the facility that they would like to review. The form to file a request is available on SRVSA's website: https://srvsa.org/resources/public-records/ .
11	24:30 – 26:20	X Braithwaite	Commenter stated that parts of the permit renewal application form appeared not to be filled out. Commenter stated that they were looking at pages 1 through 15 of the application and stated that the potential to emit (PTE) values appeared to be blank or zero. Commenter asked whether certain parts of the form did not apply to the facility.	SRVSA's permit application is considered administratively complete by NJDEP. Commenter appears to be referencing the Potential to Emit on pages 13 – 18 of the RADIUS file associated with SRVSA's permit application. The Potential to Emit for Subject Items E1 to E8, E130, E131, and E132 were accounted for in Subject Items U1 and U140 OS Summary and Operating Scenarios. Potential to Emit values are present starting with the second item on pdf page 18. Blank sections are also due in part to relic equipment that is no longer in use and therefore has no Potential to Emit, some of which is being removed from the permit as part of this renewal (for example equipment numbers E3, E7, E130, E131, and E132), and in part due to the nature of the form. The form covers a wide variety of applications and therefore not all parts are applicable to all facilities. Additionally, values below reporting thresholds may appear as zeroes.

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12	26:25	X Braithwaite	Commenter asked whether SRVSA's fugitive emissions are above reportable levels, and asked if SRVSA has reported fugitive emissions data.	SRVSA calculates both fugitive and stack emissions annually using generally accepted engineering calculations and factors. Site-wide total emissions, including fugitive emissions, are compared to the applicable reporting thresholds per NJDEP's Emission Statement Guidance Document and NJAC 7:27-21 and reported annually in SRVSA's Annual Emission Statement. A copy of SRVSA's most recent Annual Emission Statement for Calendar Year 2022 can be found at https://srvsa.org/resources/public-notice/ .
13	27:30	X Braithwaite	Commenter asked whether SRVSA had any air permit violations and where they can access data related to air permit violations.	SRVSA has incurred air permit violations. SRVSA's air permit violations can be accessed online through NJDEP's dataminer website (https://njems.nj.gov/DataMiner). Select the search option 'Search by Category', from the Report Category dropdown select 'Compliance and Enforcement' and click submit. Select the seventh link from the list – 'Enforcement Actions Issued by Program Interest and Date'. Enter SRVSA's Program Interest ID (35857), select Program (air), enter Start Date of Search, enter End Date of Search, and click submit. Please note that at the top of the page there is an option to export the results as pdf or excel file.
14	28:00	X Braithwaite	Commenter asked whether SRVSA had incurred any non-compliance violations for installing equipment without an operating permit.	SRVSA has not incurred any non-compliance violations for installing equipment without an operating permit. See Comment 13 response for instructions on accessing SRVSA's compliance data via NJDEP's dataminer website.

Comment No.	Meeting Recording Time Stamp (Min:Sec)	Commenter	Comment Summary	SRVSA Response
15	28:00	X Braithwaite	Commenter asked whether SRVSA had incurred any non-compliance violations for going over thresholds for working hours.	SRVSA has not incurred any non-compliance violations for going over thresholds for working hours. See Comment 13 response for instructions on accessing SRVSA's compliance data via NJDEP's dataminer website.
16	28:00	X Braithwaite	Commenter asked whether SRVSA had incurred any other non-compliance violations.	SRVSA occasionally incurs reporting deviations, which are reported to NJDEP. NJDEP takes the appropriate action to resolve these deviations, including issuing a notice of violation if appropriate. SRVSA's non-compliance violations can be accessed online through NJDEP's dataminer website (https://njems.nj.gov/DataMiner). See Comment 13 response for instructions on accessing SRVSA's compliance data via NJDEP's dataminer website.
17	29:25	X Braithwaite	Commenter asked whether SRVSA would be willing to create a summary sheet on the renewal application. Commenter requested that the summary sheet contain health data of SRVSA's workers, health data of the community, and a summary of what members of the community should do to protect themselves while the facility is in existence.	The data that SRVSA is required to maintain is available in SRVSA's Compliance Statement/Project Summary document and Environmental Justice Hearing Presentation (both available at https://srvsa.org/resources/public-notices/). SRVSA adheres to the State and Federal emissions regulations currently in place to protect the health of the community. SRVSA's incinerator has robust air pollution control technologies used to comply with State and Federal emissions requirements.

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18	30:55	X Braithwaite	Commenter asked when SRVSA's response to the comments received during the public comment period would be available.	SRVSA responded during the hearing that written responses would be available following the close of the public comment period, which was extended to February 5, 2024 per the request of the commenter. The responses are posted to SRVSA's and NJDEP's website, and a printed copy is available at the Bridgewater Branch of the Somerset County Library.

No written comments were received.