State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Division of Air Quality
P.O. Box 27
Trenton, NJ 08625-0027

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

November 1, 2006

Mr. James A. Keeler
Facility Manager
Sunoco, Inc. (R&M) Eagle Point Facility
PO Box 1000
Westville, NJ 08093-1000

Re: PI#55781 – Sunoco, Inc. (R&M) Eagle Point Facility

Dear Mr. Keeler:

The New Jersey Department of Environmental Protection (Department) has determined that certain units at your facility may be subject to the Best Available Retrofit Technology (BART) requirements of the federal Regional Haze Rule (40 CFR 51.300). We request that you review the attached draft list of "BART-affected equipment" at your facility and advise us if additional equipment should be added to the list, or any equipment should be deleted from the list, based on criteria discussed below.

The Department identified your facility to be a potential BART-eligible source having "BART-affected equipment" according to the following provisions under the Clean Air Act:

1. Major stationary source contains emission units in one or more of the 26 specific BART source categories listed in the Clean Air Act;
2. Emission units within the BART category were in existence on August 7, 1977, and began operation after August 7, 1962;
3. Current potential emissions from all the qualified emission units within the affected facility exceed 250 tons per year or more for any single visibility–impairing pollutant. (Visibility–impairing pollutants that must be addressed by BART sources in New Jersey are sulfur dioxide (SO2), oxides of nitrogen (NOx) and particulate matter); and
4. Qualified emission units have the potential to emit 40 tons per year or more of NOx or SO2, or 15 tons per year or more of particulate matter less than 10 microns (PM10).

Attachment 1 contains a preliminary list of what we believe are "BART-affected equipment" at your facility, based on a review of the equipment inventory from your plant's Title V Operating Permit. All emission units located at your facility meeting the date eligibility criteria above and having emissions over the de minimis levels are subject to the BART requirements, even if the units are not listed in the attachment. We refer to these as "BART-affected equipment." If the cumulative emissions from all BART-affected equipment are less than 250 tons per year, then you are not required to make a determination of BART for that pollutant for your emission units.

The Department intends to propose that you perform a top-down facility-specific evaluation, similar to the Reasonably Available Control Technology (RACT) analysis found at N.J.A.C. 7:27-19.13, to determine if air pollution control for any of the three designated visibility-impairing pollutants is warranted. We believe this process meets the federal requirements for BART.

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Since your facility is located in nonattainment areas for ozone and fine particulates, this process will also be useful for addressing the RACT requirement for attainment of the health based National Ambient Air Quality Standards. If you have questions on the top-down process, or wish to discuss the results of your evaluation before submittal is required, please contact Yogesh Doshi at Yogesh.Doshi@dep.state.nj.us, or by telephone at (609) 633-7249. We welcome your early feedback.

The Department intends to propose a rule change to require a formal submittal of this top-down evaluation in 2007, to address the BART requirements. If you believe that the sum of the emissions from all units at your facility built prior to August 7, 1977, does not meet the 250 tons per year potential to emit threshold for each of the visibility impairing pollutants, or any equipment on the attached list falls below the applicable de minimis levels, please notify the Department. Please include a source-by-source listing of the potential to emit for all eligible equipment at your facility for each visibility impairing pollutant if you intend to show that the sum of these units is below the 250 ton per year threshold for each pollutant, or the de minimis potential to emit for any equipment is less than 40 tons per year for NOx or for SO2, or 15 tons per year of PM10.

All correspondence should be sent to the following address:

New Jersey Department of Environmental Protection
Bureau of Operating Permits
401 East State Street
2nd Floor, PO Box 27
Trenton, NJ 8625-0027
Attention: Margaret Gardner

Please feel free to contact Margaret Gardner of my staff by e-mail at Margaret.Gardner@dep.state.nj.us, or by telephone at (609) 292-7095, with any general questions on this matter.

Sincerely,

William O'Sullivan, P.E.
Director
Division of Air Quality

Enclosure
C: T. Allen, U.S.F.W.S.
Randy Moore, U.S.D.O.A.
R. Werner, U.S.E.P.A.
J. Preczewski
C. Salmi
Y. Doshi
M. Gardner
R. Papalski

PI Name	SUNOCO INC (R&M) EAGLE POINT FACILITY			
PI Number	55781			
Equipment Inventory. NJID	Equipment Desc.	Installation Date	Facility Designation	Control Device Desc./ID
E5	VPS HEATER HA-1		1026	
E6	VPS HEATER HA-3A		1028	
E7	VPS HEATER HA-3B		1027	
E8	VPS HEATER HA-4		1025	
E12	FCCU Heater 5A		1004A	
E13	FCCU-Regenerator		FCCU Regen	Ten 3-stage cyclones* Quench section of 2 stage scrubber system Venturi Scrubber
E22	J15 A FCCU Compressor engines		J15A	
E23	J15 B FCCU Compressor engines		J15B	
E24	J15 C FCCU Compressor engines		J15C	
E25	J15 D FCCU Compressor engines		J15D	
E26	J15 E FCCU Compressor engines		J15BE	
E27	J15 F FCCU Compressor engines		J15F	
E28	FCCU Heater B-2		1001	
E29	FCCU Heater B-4		1003	
E30	FCCU Heater B-3		1002	
E32	Poly Heater B-301	P-1968	RK1	
E37	HTU #1 Heater HH1		1005	
E39	ISOM PH-1		1012	
E42	ISOM PH-4		1013	
E43	Slop Oil Sump 2F-224		Sump	
E44	ULSD Process Heater 2H201		1006	
E45	ULSD Process Heater 2H202		1007	
E46	ULSD Process Heater 2H203		1008	
E47	Cumene Loading Spot #1		R5-1	
E48	Cumene Loading Spot #2		R5-2	
E51	AH-1T Asphalt heater		1029	
E55	CRU PH-6		1023	
E56	CRU Heater PH-1		1016	
E57	CRU Heater PH-2		1017	
E58	CRU Heater PH-3		1018	
E59	CRU Heater PH-4A		1019	
E60	CRU Heater PH-4b		1020	
E61	CRU Heater PH-5A		1055	

E62	CRU Heater PH-5B		1021	
E65	CRU Heater HC 301		1009	
E66	CRU Heater HC-302		1010	
E67	SRU1 Complex		SRU1	SRU Thermal Oxidizer
E77	Sour Water Stripper		SRU2	SWS offgas flare
E78	Oil Skimmer vessel		SR3	SWS offgas flare
E81	Sulfolane/Clay Treater Unit		FL1	East side flare West side flare Ground ZTOF flare
E82	CRU-2/HTU-4		FL2	East side flare West side flare Ground ZTOF flare
E83	Hydrotreater Unit 1		FL3	East side flare West side flare Ground ZTOF flare
E84	ULSD unit		FL4	East side flare West side flare Ground ZTOF flare
E85	ISOM/HTU-2		FL5	East side flare West side flare Ground ZTOF flare
E86	Vacuum Pipestill		FL6	East side flare West side flare Ground ZTOF flare
E87	Fluid Catalytic Cracking Unit		FL7	East side flare West side flare Ground ZTOF flare
E88	Catalytic Polymerization Unit		FL8	East side flare West side flare Ground ZTOF flare
E89	Cumene Unit		FL9	East side flare West side flare Ground ZTOF flare
E90	Sulfur Recovery Unit		FL10	East side flare West side flare Ground ZTOF flare
E91	Alkylation Unit		FL11	East side flare West side flare Ground ZTOF flare
E92	Powerhouse		FL12	East side flare West side flare Ground ZTOF flare
E93	Wasterwater Treatment Plant		FL13	East side flare West side flare Ground ZTOF flare
E94	API Separator		APIS	
E95	API Thickner		APIT	
E96	Dock Sump		Sump	
E97	Aeration Basin		AER	
E98	WWTP		DSL1	
E99	Hand		99	Handex Catalytic Oxidizer

E142	River Pump Diesel Fire Pump Driver		DSL2	
E310	Brinemaker#1		BR1	Particulate filter (dust bag)
E311	Brinemaker#2		BR2	Particulate filter (dust bag)
E318	Gas fired duct burner for gas turbine #1		DB1	Catalytic Oxidizer
E319	Gas turbine generator #1		GT1	Catalytic Oxidizer
E320	Gas fired duct burner for gas turbine #2		DB2	Catalytic Oxidizer
E321	Gas turbine generator #2		GT2	Catalytic Oxidizer
E325	Cogen Diesel Fire Pump		DL3	
E334	FCCU J-15G Compressor Engine		J15G	
E412	FCCU Heater 5B		1004B	
E413	Spray Dryer Air Heater		Dryer1	
E414	Metal Hydroxide Spray Dryer		Dryer2	
E415	East Side Flare		East Flare	
E416	West Side Flare		West Flare	
E417	Ground ZTOF Flare		Ground	
E5600	Distillate fired engine		Engine	
E5601	Distillate fired Boiler #1		Hot Vap	
E5602	Distillate fired Boiler #2		Cold Vap	
E6702	Sulfur Recovery Unit Process (new)		SRU Process2	SRU thermal oxidizer
E55015	LSG Reactor Preheat Furnace		H-1	
E55016	LSG Stripper Reboiler		H-2	

*Ten 3-stage cyclones in parallel-Last stage considered as particulate control device

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JON S. CORZINE
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November 1, 2006

Mr. John Ponticello
Refinery Manager
ConocoPhillips Company
1400 Park Avenue
Linden, NJ 07036

Re: PI#41805 – ConocoPhillips

Dear Mr. Ponticello:

The New Jersey Department of Environmental Protection (Department) has determined that certain units at your facility may be subject to the Best Available Retrofit Technology (BART) requirements of the federal Regional Haze Rule (40 CFR 51.300). We request that you review the attached draft list of "BART-affected equipment" at your facility and advise us if additional equipment should be added to the list, or any equipment should be deleted from the list, based on criteria discussed below.

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Randy Moore, U.S.D.O.A.
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C. Salmi
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M. Gardner
R. Papalski

PI Name	CONOCO PHILLIPS			
PI Number	41805			
Equipment Inventory. NJID	Equipment Desc.	Installation Date	Facility Designation	Control Device Desc./ID
E186	Stretford Reactor Tank	PCP970043	TK301TGCU	
E187	Stretford Oxidizer Tank	PCP970043	TK302TGCU	
E188	Stretford Oxidizer Tank	PCP970043	TIK303TGCU	
E189	Stretford Oxidizer Tank	PCP970043	TK304TGCU	
E241	PFBW Hydrofiner Heater	PCP970033	F-101 PFBW	
E242	DSU-1 Gas Oil Heater	PCP970031	F-101 DSU-1	
E243	PFBW Reheat Heater	PCP970030	F-102 PFBW	
E244	DSU-1 Treat Gas Heater	PCP970031	F-102 DSU-1	
E245	PFBW Reheat Heater	PCP970030	F-103 PFBW	
E246	PFBW Reheat Heater	PCP970030	F-104 PFBW	
E247	PFBW Reheat Heater	PCP970030	F-105 PFBW	
E248	PFBW Regen Gas Heater	PCP970032	F-106 PFBW	
E249	PFBW Dryer Heater	003374	F-107 PFBW	
E250	PFBW Reboiler Heater	PCP970034	F-108 PFBW	
E251	FCCU Feed Preheat Heater	PCP970045	F-251 FCCU	
E253	DSU-2 Reactor Heater	PCP970035	F-401 DSU-2	
E254	DDU Heater 15 MMBtu/hr (U2)	036012	F-401 DDU	
E254	DDU Heater	31-Oct-77	F-401-DDU	
E255	Cat Naphtha Hydrotreater Heater	31-Oct-77	F-601-CNHT	
E256	ISOM Purge Gas Heater 45 MMBtu/hr (U2)	036016	F-602 ISOM	
E257	Atmospheric Heater	004147	F-701 APS	
E258	Outboard Flash Heater	004147	F-702 OBFT	
E259	Vacuum Tower Heater	004147	F-751 VPS	
E260	ISOM Reactor Charge Heater 14.9 MMBtu/hr (U2)	124280	F-501 ISOM	
E261	ISOM Reactivation Gas Heater 8.8 MMBtu/hr (U2)	124279	F-502 ISOM	
E262	SDA Hot Oil Heater 130 MMBtu/hr (U2)	PCP010001	F-601 SDA	
E263	FCCU Regenerator	069058 and Log # 019	FCCU Regen	
E264	FCCU Spent Catalyst Hopper	P-1968	Cat Spnt Hop	
E265	FCCU Fresh Catalyst Hopper	P-1968	Cat Frsh Hop	
E266	Sulfur Recovery Unit Claus Plant	PCP970043	SRUs	
E267	TGCU Cooling Tower	PCP970043	TGCU CT301	
E268	PFBW D118 Vent - U6	043723	PFBW D118	
E269	PFBW T104 Scrubber Vent - U6	043724	PFBW T104	
E270	PFBW MOV Bonnets Vent - U6	108378	PFBW Bonnet	
E271	Marine Loading VCU	098301	Ref Mar Load	
E272	TPT Marine VCU	109320	TPT Mar Load	

E273	LMT Rack VRU/VCU Control	PCP980001	LMT Tr Rack	
E274	TPT Rack VRU	PCP980001	TPT Tr Rack	
E275	Alkylation Main/Acid Emergency Flare	P-1968	ABW Flare	
E276	Cat Light Ends Unit Emergency Flare	P-1968	CLEU Flare	
E277	Eastside Emergency Flare	P-1968	Estsde Flare	
E279	Poly Main/Acid Emergency Flare	P-1968	Poly Flare	
E280	API Main Bay-Channel 3	P-1968	API Mainbay	
E281	API Preseparator-Channels 4-7	P-1968	API PreSep□□	
E282	API Preseparator-Channel 3	037523	API PreSep 3	
E292	Fixed Roof Tank	P-1968	TK102ABW	
E294	API Mainby-Channels 4-7	P-1968	API Mnby 4-7	
E295	Rahway River Separator East	046946	RR Sep East	
E296	Rahway River Separator West	046946	RR Sep West	
E299	Fixed Roof Tank	970001	T619	
E301	WWTP Sludge Handling Equipment	P-1968	Sludge	
E302	FCBW Temp Catalyst Additive	PCP970002	FCBW	
E502	Hydrogen Plant Heater		H2 Heater	
E503	Hydrogen Steam Vent		H2 Steam	
E504	Merifiner Thermal Oxidizer		Merifiner	
E1003	Bag Dump Station/Mastermix Feeder - Line No. 1	GEN990002	Mastermix#1	
E1004	Bag Dump Station/Mastermix Feeder - Line No. 2	GEN990003	Mastermix#2	
E1005	Mixer Feed Hopper Vent - Line No. 1	GEN990001	Mix Fd #1	
E1006	Mixer Feed Hopper Vent - Line No. 2	GEN990004	Mix Fd #2	
E1007	Pellet Loadout Dust Collector #1	GEN990005	Pellet	
E1008	Seed Bed Silo	GEN990011	Seed Bed	
E1009	Rail Car Vent Line No. 1	GEN990009	Rail Vent #1	
E1010	Rail Car Vent Line No. 2	GEN990010	Rail Vent #2	
E1013	Truck Loading Facilities	GEN990006	Truck	
E1014	Polypropylene Unit	PCP990008	PP Unit	
E1015	Polypropylene Unit Cooling Tower	PCP990007	PP Ct	
E1116	Pellet Loadout Dust Collector #2	GEN990005	Pellet	
E1302	Portable Diesel Engine #1	PCP000006	Port #1	
E1303	Portable Diesel Engine #2	PCP000006	Port #2	
E1304	Portable Diesel Engine #3	PCP000006	Port #3	

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JON S. CORZINE
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LISA P. JACKSON
Commissioner

November 1, 2006

Mr. Francis X. Sullivan
Director, Asset Operations
PSEG Power, LLC
80 Park Plaza (T-25P)
Newark, NJ 07101

Re: PI#12202 – PSEG Hudson Generating Station

Dear Mr. Sullivan:

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Attention: Margaret Gardner

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Sincerely,

William O'Sullivan, P.E.
Director
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C. Salmi
Y. Doshi
M. Gardner
R. Papalski

PI Name	PSEG FOSSIL LLC HUDSON GENERATING STATION			
PI Number	12202			
Equipment Inventory. NJID	Equipment Desc.	Installation Date	Facility Designation	Control Device Desc./ID
E1	Unit No. 1	10-Dec-64	006-01	CD1: Water Injection
E2	Unit No. 2	18-Dec-68	003-01	CD2: Low Nox Burners CD3: Electrostatic Precipitator CD20:SNCR CD24:AEFLGR CD25: Flu Gas Recirc. CD26: SCR CD27: Baghouse
E14	Emergency Fire Pump		022-01	
E22	Coal Receiving System	18-Dec-68	None	
E23	Coal Reclaim System	18-Dec-68	None	

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P.O. Box 27
Trenton, NJ 08625-0027

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

November 1, 2006

Mr. Jay A. Yeager
Refinery Manager
Amerada Hess Corporation
1 Hess Plaza
Woodbridge, NJ 07095

Re: PI#17996 – Amerada Hess Corp Port Reading

Dear Mr. Yeager:

The New Jersey Department of Environmental Protection (Department) has determined that certain units at your facility may be subject to the Best Available Retrofit Technology (BART) requirements of the federal Regional Haze Rule (40 CFR 51.300). We request that you review the attached draft list of "BART-affected equipment" at your facility and advise us if additional equipment should be added to the list, or any equipment should be deleted from the list, based on criteria discussed below.

The Department identified your facility to be a potential BART-eligible source having "BART-affected equipment" according to the following provisions under the Clean Air Act:

1. Major stationary source contains emission units in one or more of the 26 specific BART source categories listed in the Clean Air Act;
2. Emission units within the BART category were in existence on August 7, 1977, and began operation after August 7, 1962;
3. Current potential emissions from all the qualified emission units within the affected facility exceed 250 tons per year or more for any single visibility–impairing pollutant. (Visibility–impairing pollutants that must be addressed by BART sources in New Jersey are sulfur dioxide (SO2), oxides of nitrogen (NOx) and particulate matter); and
4. Qualified emission units have the potential to emit 40 tons per year or more of NOx or SO2, or 15 tons per year or more of particulate matter less than 10 microns (PM10).

Attachment 1 contains a preliminary list of what we believe are "BART-affected equipment" at your facility, based on a review of the equipment inventory from your plant's Title V Operating Permit. All emission units located at your facility meeting the date eligibility criteria above and having emissions over the de minimis levels are subject to the BART requirements, even if the units are not listed in the attachment. We refer to these as "BART-affected equipment." If the cumulative emissions from all BART-affected equipment are less than 250 tons per year, then you are not required to make a determination of BART for that pollutant for your emission units.

The Department intends to propose that you perform a top-down facility-specific evaluation, similar to the Reasonably Available Control Technology (RACT) analysis found at N.J.A.C. 7:27-19.13, to determine if air pollution control for any of the three designated visibility-impairing pollutants is warranted. We believe this process meets the federal requirements for BART.

Since your facility is located in nonattainment areas for ozone and fine particulates, this process will also be useful for addressing the RACT requirement for attainment of the health based National Ambient Air Quality Standards. If you have questions on the top-down process, or wish to discuss the results of your evaluation before submittal is required, please contact Yogesh Doshi at Yogesh.Doshi@dep.state.nj.us, or by telephone at (609) 633-7249. We welcome your early feedback.

The Department intends to propose a rule change to require a formal submittal of this top-down evaluation in 2007, to address the BART requirements. If you believe that the sum of the emissions from all units at your facility built prior to August 7, 1977, does not meet the 250 tons per year potential to emit threshold for each of the visibility impairing pollutants, or any equipment on the attached list falls below the applicable de minimis levels, please notify the Department. Please include a source-by-source listing of the potential to emit for all eligible equipment at your facility for each visibility impairing pollutant if you intend to show that the sum of these units is below the 250 ton per year threshold for each pollutant, or the de minimis potential to emit for any equipment is less than 40 tons per year for NOx or for SO2, or 15 tons per year of PM10.

All correspondence should be sent to the following address:

New Jersey Department of Environmental Protection
Bureau of Operating Permits
401 East State Street
2nd Floor, PO Box 27
Trenton, NJ 8625-0027
Attention: Margaret Gardner

Please feel free to contact Margaret Gardner of my staff by e-mail at Margaret.Gardner@dep.state.nj.us, or by telephone at (609) 292-7095, with any general questions on this matter.

Sincerely,

William O'Sullivan, P.E.
Director
Division of Air Quality

Enclosure
C: T. Allen, U.S.F.W.S.
Randy Moore, U.S.D.O.A.
R. Werner, U.S.E.P.A.
J. Preczewski
C. Salmi
Y. Doshi
M. Gardner
R. Papalski

PI Name	AMERADA HESS CORP PORT READING			
PI Number	17996			
Equipment Inventory. NJID	Equipment Desc.	Installation Date	Facility Designation	Control Device Desc./ID
E1	Fluid Catalytic Cracking Unit		FCCU	Venturi Scrubber
E2	Sulfur Recovery System		SRU	Venturi Scrubber
E3	Flu Gas Reheat		FGR	Venturi Scrubber
E5	Boiler #3		B-3	
E6	Boiler #4		B-4	
E7	Separator FA-104A		WWT	Adsorber
E8	Separator FA-104B		WWT	Adsorber
E9	API Separator FA-104F		WWT	Adsorber
E10	API Separator FA-104G		WWT	Adsorber
E11	Parallel Plate Separator FA-104C		WWT	Adsorber
E12	Parallel Plate Separator FA-104D		WWT	Adsorber
E13	Sand Filter Feed Sump X-101		WWT	Adsorber
E14	Sand Filter Feed Sump X-202		WWT	Adsorber
E15	Parallel Plate Separator F-201		WWT	Adsorber
E16	Sand Filter Feed Sump X-203		WWT	Adsorber
E64	Back Flare		FLAR	
E66	Space Heating Boiler	1-Sep-75	MSB	
E69	Rental Air Compressor		RAC	
E70	2G Truck Loading Rack-Gas		2nd Reserve	Adsorber
E94	Marine Loading Facility		Marine Load	Adsorber
E95	Boiler #1 - 2nd Reserve		Boiler #1	
E96	Boiler #2 - 2nd Reserve		Boiler #2	
E97	Boiler #3 - 2nd Reserve		Boiler #3	