



955 Delancy Street
Newark, NJ 07105

August 11, 2021

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

Subject: Newark Energy Center (PI 08857) 5-Year Operating Permit Renewal Application

This application is being submitted on behalf of Newark Energy Center (the "Facility") and represents a complete Operating Permit Renewal Application per the requirements of N.J.A.C. 7:27-22.30. N.J.A.C. 7:27-22.30(c) requires that an application be submitted to the Department at least 12 months prior to the expiration date and encourages applicants to submit the application 15 months prior to the expiration date of the permit. The existing permit held by Newark Energy Center expired on October 31, 2017. A prior 5-year renewal was submitted in a timely fashion by the Facility and as such the Facility has been operating under Application Shield. Extending the prior expiration date out by five years results in a new expiration date of October 31, 2022. As such, the 5-year renewal for the Operating Permit is due no later than October 31, 2021. The enclosed application meets the applicable deadline.

In order for an operating permit renewal to be considered administratively complete per N.J.A.C. 7:27-22.30(d), the application must contain the following:

1. A summary of all the changes that have been incorporated into the operating permit through administrative amendments, minor modifications, or significant modifications during the past five-year term of the initial operating permit or the most recent renewal thereof;
2. Any additional changes to the operating permit which the permittee seeks to have included in the operating permit. For these changes the permittee shall submit all information required pursuant to the procedures for an administrative amendment, seven-day-notice change, minor modification, or significant modification, pursuant to N.J.A.C. 7:27-22.20, 22.22, 22.23 or 22.24, as applicable;
3. Any changes which the permittee has submitted as a seven-day-notice change since the date of issuance of the most recent operating permit, and which the permittee seeks to have incorporated into the operating permit;
4. Changes made to information required in the operating permit for insignificant source operations at the facility;

5. A summary of the results of any source emissions testing or monitoring required by the operating permit that has been performed since the date of issuance of the most recent operating permit for the source operations included in the operating permit; and
6. Proposed draft operating permit conditions that:
 - a. Reflect any change to the facility or its operations made through a seven-day-notice change since the last operating permit issuance; and
 - b. Reflect any change to the facility or its operations proposed for inclusion in the renewed operating permit.

The enclosed application meets the requirements of an administratively complete operating permit renewal. The Facility has already submitted the necessary stack testing reports and annual emissions per requirement number 5 above. There have been no seven-day notices since the last renewal application per requirement 3 above. The Facility is not requesting any changes per requirements 4 and 6 above. As such, this document and its attachments should represent an administratively complete application. The current draft permit posted by the Department incorporates most of the changes necessary per requirements 1 and 2 above. The one component that is not included in the existing draft permit is the revised HAPs based on N.J.A.C. 7:27-17.9(a) reporting thresholds. Per N.J.A.C. 7:27-22.30(l):

"An operating permit with an expiration date of February 12, 2021 or later shall include in the application for renewal each HAP that may be emitted and its potential to emit, including any non-captured emissions, in tons per year, and any other units, for example, pounds per hour, required to verify compliance with any applicable requirement. If the source operation's potential to emit a given HAP does not exceed the applicable threshold for reporting emissions at N.J.A.C. 7:27-17.9(a), the application for renewal of the operating permit need not include the air contaminant."

NEC has performed an analysis on the HAPs emitted by the Facility and determined that the compounds that exceed the threshold and thus must be included in the Operating Permit are as follows. In the Table below, each unit in the operating permit is shown along with Facility Wide emissions for each pollutant. The last two columns show the Reporting Threshold and SOTA Threshold for each compound. For all the pollutants shown below, U1 (2 Combustion Turbines and 2 Duct Burners) is the only unit that exceeds the reporting or SOTA threshold.

Compound	U1 (Emissions (lb/yr)	U3 Emissions (lb/yr)	U4 Emissions (lb/yr)	Facility Wide Emissions (lb/yr)	Reporting Threshold (lb/yr)	SOTA Threshold (lb/yr)
Acetaldehyde	1,577.6	0.072	0.32	1,578.0	21.0	10,000.0
Acrolein	142.8	0.023	0.038	142.8	1.0	80.0
Benzene	474.8	2.2	0.38	477.5	6.0	4,000.0
1,3-Butadiene	17.0	0.00	0.016	17.0	1.5	140.0
Ethylbenzene	1,262.1	0.00	0.00	1,262.1	19.0	10,000.0
Formaldehyde	4,394.3	0.23	0.49	4,395.0	3.5	4,000.0
Naphthalene	51.7	0.00	0.035	51.8	1.4	10,000.0
Propylene oxide	1,143.8	0.00	0.00	1,143.8	12.0	10,000.0
Toluene	5,129.7	0.81	0.17	5,130.7	2,000.0	10,000.0
Xylenes	2,524.2	0.55	0.12	2,524.8	2,000.0	10,000.0

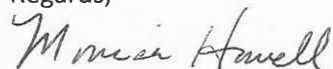
Arsenic & inorganic arsenic compounds	0.15	0.00	0.00	0.15	0.010	10.0
Cadmium compounds	0.82	0.00	0.00	0.82	0.010	20.0
Cobalt metal and compounds	0.063	0.00	0.00	0.063	0.0050	200.0
Nickel compounds	1.6	0.00	0.00	1.6	0.60	2,000.0
Polycyclic organic matter	86.8	0.00	0.069	86.8	2.0	20.0

The attachments to this document are as follows:

- RADIUS Submittal File
- Summary of Stack Test Results
- Acid Rain Program Permit Renewal Application Form

Pursuant to N.J.A.C. 7:27-22.10(a), please confirm that NEC's application is administratively complete. If there are any questions or comments pertaining to this application, please contact me at 609.221.2859 or mhowell@ppmsllc.com.

Regards,



Monica Howell
Environmental Manager
Power Plant Management Services

STEP 3**Permit Requirements****Read the standard 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:

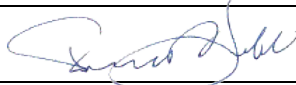
- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the 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 Richard Grubb, Authorized Signatory	
Signature 	Date 08-10-2021



Instructions for the Acid Rain Program Permit Application

The Acid Rain Program requires the designated representative to submit an Acid Rain permit application for each source with an affected unit. A complete Certificate of Representation must be received by EPA before the permit application is submitted to the Title V permitting authority. A complete Acid Rain permit application, once submitted, is binding on the owners and operators of the affected source and is enforceable in the absence of a permit until the Title V permitting authority either issues a permit to the source or disapproves the application.

Please type or print. If assistance is needed, contact the Title V permitting authority.

STEP 1 A Plant Code is a 4 or 5 digit number assigned by the Department of Energy's (DOE) Energy Information Administration (EIA) to facilities that generate electricity. For older facilities, "Plant Code" is synonymous with "ORISPL" and "Facility" codes. If the facility generates electricity but no Plant Code has been assigned, or if there is uncertainty regarding what the Plant Code is, send an email to the EIA. The email address is EIA-860@eia.gov.

STEP 2 In column "a," identify each unit at the facility by providing the appropriate unit identification number, consistent with the identifiers used in the Certificate of Representation and with submissions made to DOE and/or EIA. Do not list duct burners. For new units without identification numbers, owners and operators must assign identifiers consistent with EIA and DOE requirements. Each Acid Rain Program submission that includes the unit identification number(s) (e.g., Acid Rain permit applications, monitoring plans, quarterly reports, etc.) should reference those unit identification numbers in exactly the same way that they are referenced on the Certificate of Representation.

Submission Deadlines

For new units, an initial Acid Rain permit application must be submitted to the Title V permitting authority 24 months before the date the unit commences operation. Acid Rain permit renewal applications must be submitted at least 6 months in advance of the expiration of the acid rain portion of a Title V permit, or such longer time as provided for under the Title V permitting authority's operating permits regulation.

Submission Instructions

Submit this form to the appropriate Title V permitting authority. If you have questions regarding this form, contact your local, State, or EPA Regional Acid Rain contact, or call EPA's Clean Air Markets Hotline at (202) 343-9620.

Paperwork Burden Estimate

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2060-0258). Responses to this collection of information are mandatory (40 CFR 72.30 and 72.31). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 8 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.



Newark Energy Center 5 year Renewal Stack Testing 3-9-21 thru 3-11-21

	CT 11	CT 12	Permit Limit	CT11 w/DB	CT12 w/DB	Permit Limit
PM lb/hr	0.9	1.1	6.6	0.95	1.3	7.9
NOX ppmV@ 15% O2	1.2	1.4	2	1.4	1.3	2
NOX lb/hr	10.7	12.8	16.8	13.4	13.3	16.5
NOX lb/MMBTU	0.0044	0.005	0.0073	0.005	0.005	0.0073
NOX lb/MWHR	0.05	0.05	0.75	0.06	0.06	0.75
CO ppmV @15%O2	<0.1	0.1	2	<0.1	0.2	2
CO lb/hr	<0.2	0.3	10.2	<0.2	0.8	10
CO lb/MMBTU	<0.001	0.0002	0.0044	<0.001	0.0003	0.0045
VOC ppmV@15%O2	0.2	0.4	1	0.3	0.4	2
VOC lb/hr	0.7	1.24	2.9	1	1.4	5.7
VOC lb/mmbtu	0.0003	0.0005	0.001	0.0004	0.0005	0.0025
SOX lb/hr	0.56	0.36	2.8	0.4	0.39	2.5
PM-10 lb/hr	2	3.1	11	2.7	3	13.2
PM-2.5 lb/hr	2	2.7	11	2.3	2.5	13.2



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

Attachment to the RADIUS Air Operating Permit Renewal Application

Submittal Date: 8/11/2021

Facility Name: Newark Energy Center

PI#: 8857

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, 2nd 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 resubmittal 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 resubmittal 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/aqpp/permitguide.html> and <http://www.state.nj.us/dep/aqpp/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.

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 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#: 8857

Facility Name: Newark 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: Richard Grubb Signature: _____ Date: 8/11/2021

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: Monica Howell Signature: _____ Date: 8/11/2021

Section Being Certified: All Sections

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.

No.	Date of 7-Day Notice	Brief Description of Change



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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 U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1 OS0	2	Renewal Stack Test Requirement for Turbines for NOx, CO, VOC, SO2, TSP, PM-10 and PM-2.5 emission limits while burning natural gas.	18 months prior to permit expiration	Stack test results on file	Submit Stack Test Results		
U1 OS0	3	PM Stack Test	Quarterly	Stack test results on file	Submit Stack Test Results		

Make additional copies of this form if needed.



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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 U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1 OS0	5	Continuous Emissions Monitoring for CO, NOx, and O2 concentrations	Continuous Emissions Monitoring System (CEMS)	DAS electronic storage	None		
U1 OS0	6	Continuous Process Monitoring System for Ammonia for Turbines	Continuous Process Monitoring System	DAS electronic storage	None		

Make additional copies of this form if needed.

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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 2nd 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 3rd 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 2nd 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.

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.

Subject Item	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
OS / Ref #			
<i>Subject Item</i> FC	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
<i>OS / Ref #</i>			
<i>Subject Item</i> IS1	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
<i>OS / Ref #</i>			
<i>Subject Item</i> IS3	In Compliance	Consistent with all methods listed in monitoring and recordkeeping 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.

Subject Item	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
OS / Ref #			
<i>Subject Item</i> GR1	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
<i>OS / Ref #</i>			
<i>Subject Item</i> GR2	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
<i>OS / Ref #</i>			
<i>Subject Item</i> U1	In Compliance	Consistent with all methods listed in monitoring and recordkeeping 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.

Subject Item	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
OS / Ref #			
Subject Item U2	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
OS / Ref #			
Subject Item U3	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
OS / Ref #			
Subject Item U4	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
OS / Ref #			

Make additional copies of this form if needed.

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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		
OS / Ref #			Updated	Removed	Added
<i>Subject Item</i>					
<i>OS / Ref #</i>					
<i>Subject Item</i>					
<i>OS / Ref #</i>					
<i>Subject Item</i>					
<i>OS / Ref #</i>					

Make additional copies of this form if needed.

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

Permit Being Modified

Permit Class: BOP **Number:** 180001

Description of Modifications: Newark Energy Center is submitting this application for the 5-Year Renewal of the Facility's Operating Permit. The prior 5-year renewal is still under review by NJDEP but based on the end date of the prior permit (October 31, 2017), the next 5-year renewal application must be submitted by October 2021 to be timely with 12 months prior to expiration requirement per N.J.A.C. 7:27-22.30(c).

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

Facility Name (AIMS): Newark Energy Center, LLC

Facility ID (AIMS): 08857

Street 955 DELANCY ST
Address: NEWARK, NJ 07105

Mailing 955 DELANCY ST
Address: NEWARK, NJ 07105

County: Essex
Location
Description:

State Plane Coordinates:

X-Coordinate:

Y-Coordinate:

Units:

Datum:

Source Org.:

Source Type:

Industry:

Primary SIC:

Secondary SIC:

NAICS: 221112

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

Contact Type: Air Permit Information Contact**Organization:** Newark Energy Center, LLC**Org. Type:** Corporation**Name:** Monica Howell**NJ EIN:** 00452391369**Title:** Environmental Manager**Phone:** (609) 221-2859 x**Mailing Address:** 955 DELANCY ST**Fax:** () - x**Address:** NEWARK, NJ 07105**Other:** () - x**Type:****Email:** mhowell@ppmsllc.com

Contact Type: BOP - Operating Permits**Organization:** NJDEP**Org. Type:** State**Name:** Michael Hogan**NJ EIN:****Title:** Environmental Engineer 2**Phone:** (609) 633-1124 x**Mailing Address:** Mail Code 41-02**Fax:** (609) 633-1112 x**Address:** DEP Air Quality Program, PO Box 420
401 East State Street, 2nd Floor
Trenton, NJ 08625-0420**Other:** () - x**Type:****Email:** michael.hogan@dep.nj.gov

Contact Type: Fees/Billing Contact**Organization:** Newark Energy Center, LLC**Org. Type:** Corporation**Name:** Richard Grubb**NJ EIN:** 00452391369**Title:** Vice President, Project Management**Phone:** (704) 315-4432 x**Mailing Address:** 955 Delancy St**Fax:** (973) 466-1550 x**Address:** Newark, NJ 07105**Other:** () - x**Type:****Email:** rgrubb@ppmsllc.com

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

Contact Type: General Contact**Organization:** Newark Energy Center, LLC**Org. Type:** Corporation**Name:** Monica Howell**NJ EIN:** 00452391369**Title:** Environmental Manager**Phone:** (609) 221-2859 x**Mailing Address:** 955 DELANCY ST**Fax:** () - x**Address:** NEWARK, NJ 07105**Other:** () - x**Type:****Email:** mhowell@ppmsllc.com

Contact Type: Owner (Current Primary)**Organization:** Newark Energy Center, LLC**Org. Type:** Corporation**Name:** Richard Grubb**NJ EIN:** 00452391369**Title:** Vice President, Project Management**Phone:** (704) 315-4432 x**Mailing Address:** 955 Delancy St**Fax:** (973) 466-1550 x**Address:** Newark, NJ 07105**Other:** () - x**Type:****Email:** rgrubb@ppmsllc.com

Contact Type: Responsible Official**Organization:** Newark Energy Center, LLC**Org. Type:** Corporation**Name:** Richard Grubb**NJ EIN:** 00452391369**Title:** Vice President, Project Management**Phone:** (704) 315-4432 x**Mailing Address:** 955 Delancy St**Fax:** (973) 466-1550 x**Address:** Newark, NJ 07105**Other:** () - x**Type:****Email:** rgrubb@ppmsllc.com

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?	No
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	
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)
IS1	Fuel Oil Storage Tanks	Storage Vessel		0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.00000000	0.000
IS3	Sulfuric Acid Storage Tank - (1) 20,000 gal tank	Storage Vessel		0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.00000000	0.007
Total												