



State of New Jersey

Department of Environmental Protection

Air, Energy and Materials Sustainability

Division of Air Quality

Bureau of Stationary Sources

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RESPONSE TO COMMENTS DOCUMENT

for

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

for

Rahway Valley Sewerage Authority

1050 E. Hazelwood Ave.

Woodbridge Twp., NJ 08827

Program Interest (PI) Number: 41702

Permit Activity Number: BOP190001

Shafi Uddin Ahmed

09/18/23

Date

Shafi Ahmed
Environmental
Engineer 3
Operating Permits

Joel Leon

09/18/23

Date

Joel Leon
Section Chief
Operating Permits

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

The Rahway Valley Sewerage Authority (RVSA) proposes the following comments and changes to the draft Title V Operating Permit Document:

1. Comment:

On page 11 of Section D (Page Index), please put back IS9 (Infrared Heaters <1 MMBTU/hr), IS10 (2 Natural gas fired heaters <1MMBTU/hr), IS11 (NG Fired Employee Building Furnace <1MMBTU/hr) and IS12 (NG Fired Employee Building Furnace <1MMBTU/hr).

Response:

The following insignificant sources have been readded to Section D of the Operating Permit:

- IS9: Infrared Heaters <1 MMBTU/hr
- IS10: 2 Natural gas fired heaters <1MMBTU/hr
- IS11: NG Fired Employee Building Furnace <1MMBTU/hr
- IS12: NG Fired Employee Building Furnace <1MMBTU/hr

2. Comment:

On page 11 of Section D and in the Facility Specific Conditions, add back IS3 (Aboveground Gasoline Storage Tank < 2000 gallons).

Response:

The insignificant source IS3 has been changed to the following: Aboveground Gasoline Storage Tank < 2000 gallons. Additionally, a compliance plan has been added to the equipment in accordance with the requirements set forth in NJAC 7:27-22.1.

3. Comment:

In the Facility Specific Requirements – Page 38 of 80, U240001, OS Summary – Remove the requirement to test for SO₂ when testing on digester gas. Digester gas fired in the engines is treated to remove sulfur.

Response:

The Department cannot remove as part of this renewal the sulfur dioxide stack test which must be conducted when burning digester gas. This stack test deletion can be proposed in the next renewal application, or any permit application filed for a modification. The required documentation and rational for the deletion must be included in any submission to the Department.

4. Comment:

On Pages 46 and 47 of 80 of the Facility Specific Requirements for U240001, the RVSA requests that the Monitoring Requirements for Reference #4 through 7 be changed to specify that the testing be based on the **average** of three Department validated test runs rather than “each of three” test runs.

Response:

The Department agrees with your comment. The monitoring requirements for U240001, Ref #4 through #7 have been changed to clarify that three Department validated runs can be averaged.