

# STATEMENT OF BASIS for STAFFORD TWP SLF

## TITLE V OPERATING PERMIT SIGNIFICANT MODIFICATION

Program Interest (PI): 79222 / Permit Activity Number: BOP250001

### I. FACILITY INFORMATION

Stafford Township Landfill is located at Recovery and Hay Rds; Manahawkin, Ocean County NJ, 08050-2701 and consists of a landfill. The facility is owned and operated by Stafford Township (Township Administrator Matthew von der Hayden).

The facility was classified as a major facility based on its potential to emit 566 tons per year of Methane. However, this permit modification is reducing potential Methane emissions from the facility because the emissions from this closed landfill are decreasing. The new facility wide Methane potential to emit is 6.06 tons per year. As a result, the facility will no longer have the potential to emit any air contaminant at a rate that exceeds the major facility threshold level.

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 includes a landfill.

This is a Permit Modification and includes the following changes:

1) Reduce the permitted emission limits for methane emitted by venting of the landfill as follows:

\* Reduce annual emissions from 566 tpy to 6.06 tpy (U1, OSS, REF#7).

\* Reduce hourly emissions from 129 lb/hr to 1.38 lb/hr (U1, OS1, REF#2).

2) Remove permit emission limits for non-methane organic compounds (NMOC) emitted by venting of the landfill as follows:

\* Annual emission limit 3.62 tpy (U1, OSS, REF#8).

\* Hourly emission limit 0.83 lb/hr (U1, OS1, REF#3).

3) Change monitoring and recordkeeping frequency for annual VOC and Methane-emissions from "annual calculations" to "initial calculations" due to the small quantity of emissions in the revised permit.

This modification will not change the facility-wide emission limits as listed in the following table:

Allowable Emission Limits	Facility's Potential Emissions (tons per year)*									
	VOC (total)	NO <sub>x</sub>	CO	SO <sub>2</sub>	TSP (total)	PM <sub>10</sub> (total)	PM <sub>2.5</sub> (total)	Pb	HAPs (total)	CO <sub>2e</sub> (total)
Current Permit	1.07	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11,886
Proposed Permit	1.07	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11,886
Change (+ / -)	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0

VOC Volatile Organic Compounds

NO<sub>x</sub> Nitrogen Oxides

PM<sub>10</sub>

PM<sub>2.5</sub>

Particulates under 10 microns

Particulates under 2.5 microns

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CO Carbon Monoxide

SO<sub>2</sub> Sulfur Dioxide

TSP Total Suspended Particulates

Pb Lead

HAPs

CO<sub>2</sub>e

Hazardous Air Pollutants

Carbon Dioxide equivalent

\* Other Any other air contaminant regulated under the Federal Clean Air Act. This modification will change permitted methane emissions from 566 to 6.06 tons per year and will remove 3.62 tons per year of Non-Methane Organic Compounds (NMOC) from the permit.

#### 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.
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.

Venting of Landfill Gas from the Landfill (E1, U1) does not require monitoring of short term emissions and requires only initial calculations to demonstrate long term emissions due to the low quantity of emissions from the Landfill.

#### 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>

This modification is not subject to any Federal regulations.

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.

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#### **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