



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

Division of Air Quality
Bureau of Air Permits
401 E. State Street, 2nd floor, P.O. Box 420, Mail Code 401-02
Trenton, NJ 08625-0420

Air Pollution Control Operating Permit
Minor Modification and Preconstruction Approval

Permit Activity Number: BOP110001

Program Interest Number: 75507

Table with 2 columns: Mailing Address and Plant Location. Mailing Address: JOSEPH ISABELLA, DIR ELECTRIC UTILITY, VINELAND CITY MUNICIPAL ELECTRIC UTILITY, PO BOX 1508, Vineland, NJ 08362-1508. Plant Location: VINELAND MUNICIPAL ELEC UTIL HOWARD M. DOWN, 211 N West Ave, Vineland City, Cumberland County.

Initial Operating Permit Approval Date: August 31, 2005
Significant Modification Approval Date: September 26, 2011
Operating Permit Expiration Date: August 30, 2010 (operating under permit application shield)

This minor modification is approved and issued under the authority of Chapter 106, P.L. 1967 (N.J.S.A. 26:2C-9.2). The equipment at the facility must be operated in accordance with the requirements of this permit.

This approval, in response to your application, merges the provisions of the previously approved operating permit and the changes from this minor modification into a single comprehensive permit that replaces the one previously issued. This minor modification is for the following proposed changes:

- Add a permit condition that states that the unit 10 boiler operating scenarios in the permit are only valid through August 31, 2012; Unit 10 is not permitted to operate, under any operating scenario, on and after September 1, 2012. This comes from a federal Consent Decree (Civil Action No. 1:11-cv-1826-RMB-JS) which requires VMEU to install and operate selective non-catalytic reduction (SNCR) for NOx control or cease operating unit 10 by September 1, 2012; VMEU has chosen to shut the unit down.
Udate the submittal requirement language for EEMPR submittal.
Remove IS17 and IS18 - these are duplicate listings of the fuel tanks in U1.

Equipment at the facility referenced by this minor modification is not covered by the permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. Pursuant to N.J.A.C. 7:27-22.33(e), this minor modification consists of both a preconstruction approval and operating permit approval. This operating permit does not include compliance schedules as part of the approved compliance plan.

The permittee shall submit to the Department and to the EPA a periodic compliance certification, in accordance with N.J.A.C. 7:27-22.19. The certification shall be submitted electronically through the NJDEP online web portal - Periodic Compliance Certification service, and shall be certified pursuant to N.J.A.C. 7:27-1.39 by the responsible official. Access to DEP Online shall be obtained by following the instructions at: http://www.state.nj.us/dep/online/. The certification should be printed for submission to EPA. The schedule for compliance certifications set forth in the compliance plan in this operating permit. The annual compliance certification reporting period will cover the calendar year ending December 31. The annual compliance certification is due to the Department and the EPA within 60 days after the end of each calendar year during which this permit was in effect. If unable to submit electronically, the certification shall be submitted on forms provided by the Department at: http://www.nj.gov/dep/enforcement/compliancecertsair.htm.

The annual compliance certification report may also be considered as your six month deviation report for the period from July 1 through December 31 which is due by January 30 of each year, as required by paragraph 13 in Section F, *General Provisions and Authorities*, of this permit, if the annual compliance certification is submitted by January 30.

New Jersey Department of Environmental Protection
Air & Environmental Quality Compliance & Enforcement
401 East State Street, P. O. Box 422
Trenton, New Jersey 08625-0422

United States Environmental Protection Agency, Region II
Air Compliance Branch
290 Broadway
New York, New York 10007-1866

New Jersey Department of Environmental Protection
Air and Environmental Quality Compliance & Enforcement
Southern Regional Enforcement Office
One Port Center, 2 Riverside Drive
Camden, New Jersey 08103

Your facility's current approved operating permit and any previous versions (e.g. superseded, expired, or terminated) are now available for download in the PDF format at: <http://www.nj.gov/dep/aqpp/>. After accessing the website, click on "Approved Operating Permits" listed under "Reports" and then type in the Program Interested (PI) Number as instructed on the screen. A RADIUS file for your permit, containing Facility Specific Requirements (Compliance Plan), Inventories, and Compliance Schedules (if needed), can be obtained by contacting your permit writer. Upon importing this information into your personal computer with RADIUS software, you will have up-to-date information in RADIUS format. RADIUS software, instructions, and help are available at the Department's website at www.state.nj.us/dep/aqpp. We also have an Operating Permit Help Line available from 9:00 AM to 4:00 PM daily, where you may speak to someone about any questions you may have. The Operating Permit Help Line number is 609-633-8248.

If, in your judgment, the Department is imposing any unreasonable condition of approval in this permit modification action, you may contest the Department's decision on the modification and request an adjudicatory hearing pursuant to N.J.S.A. 52:14b-1 et seq. and N.J.A.C. 7:27-22.32(a). All requests for an adjudicatory hearing must be received in writing by the Department within 20 calendar days of the date you receive this letter. The request must contain the information requested in N.J.A.C. 7:27-1.32 and the information on the enclosed Administrative Hearing Request Checklist and Tracking Form.

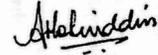
The permittee is responsible for submitting a timely and administratively complete operating permit renewal application. The Operating Permit Renewal Application consists of a RADIUS application and the Application Attachment available in Portable Document Format (PDF) and MS Word format at the Department's website <http://www.nj.gov/dep/aqpp/applying.html> (check Attachment to the RADIUS Operating Permit Renewal Application). Both the RADIUS application and the Application Attachment, along with any other supporting documents (saved on a CD) must be submitted with a cover letter (paper copy). The application is considered timely if it is received at least 12 months before the expiration date of the operating permit. To be deemed administratively complete, an application for renewal of the operating permit shall include all of the information required by the application form for the renewal and the information required pursuant to N.J.A.C. 7:27-22.30(d). However, consistent with N.J.A.C. 7:27-22.30(c), the permittee is encouraged to submit the renewal application at least 15 months prior to expiration of the operating permit, so that the Department can notify the applicant of any deficiencies in the application. This will allow the permittee to correct any deficiencies, and to better ensure that the application is administratively complete by the renewal deadline. Only applications which are timely and administratively complete will be eligible for coverage by an application shield.

Permittees that are subject to Compliance Assurance Monitoring (CAM), pursuant to 40 CFR 64, shall develop a CAM Plan for modified equipment as well as existing sources. Details of the rule and guidance on how to prepare a plan can be found at EPA's website: www.epa.gov/ttn/emc/cam.html. In addition, CAM Plans must be included as part of the permit renewal application. Permittees that do not submit a CAM Plan may have their modification applications denied, pursuant to N.J.A.C. 7:27-22.3.

If you have any questions regarding this permit approval, please call your permit writer, Michael Hogan, at (609) 633-1124.

Enclosure
CC: S. Riva, USEPA Region II

Approved by:



Aliya M. Khan
Bureau of Air Permits

OP110001

New Jersey Department of Environmental Protection
Facility Specific Requirements

Emission Unit: U10 357 MMBtu/hr utility boiler - wall (face) fired - coal or No.6 fuel oil fired

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
±	<p>Conduct a comprehensive stack test at emission point PT10 by August 31, 2011, and thereafter conduct an annual comprehensive stack test at emission point PT10 in any calendar year in which No. 6 fuel oil is combusted, to demonstrate compliance with the NO_x, CO, VOC, TSP and PM10 emission limits while combusting No. 6 fuel oil. Compliance shall also be determined by continuous emission monitoring for NO_x, CO, O₂ and opacity. In addition, the No. 6 fuel oil shall be analyzed for sulfur content at the time of stack testing.</p> <p>Three tests shall be conducted at worst case permitted operating conditions achievable under the corresponding test conditions, such as ambient (relative humidity and temperature) conditions for that day, with regard to meeting the applicable emission standards, but without creating an unsafe condition. The permittee shall submit to BTS all data necessary to substantiate the ambient conditions. The testing shall be conducted in accordance with the protocol approved by Chief, BTS. [N.J.A.C. 7:27-22.16(e)]</p>	<p>Monitored by continuous emission monitoring system continuously and by stack emission testing annually. (See Applicable Requirement);</p> <p>Unless otherwise approved in the stack test protocol or by the Department, each test run shall be 60 minutes in sampling duration. Compliance period shall be as specified in the monitoring requirement for each applicable emission limit. Three stack tests shall be conducted for NO_x, CO, VOC, TSP and PM10 emissions, while combusting No. 6 fuel oil. [N.J.A.C. 7:27-22.16(e)]</p>	<p>Recordkeeping by data acquisition system (DAS) / electronic data storage continuously, by stack emission test results and by certified lab analysis. [N.J.A.C. 7:27-22.16(e)]</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. Submit a stack test protocol to the Bureau of Technical Services (BTS) at PO Box 437, Trenton, NJ 08625 within 180 days of initial use of #6 fuel oil.</p> <p>Within 30 days of the protocol approval, the permittee must contact BTS at 609-530-4041 to schedule a mutually acceptable test date. A full stack test report and fuel sulfur analysis must be submitted to BTS within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). A certified summary test report, as described in the protocol, and a fuel sulfur analysis must be submitted to the regional enforcement office within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). The test results must be certified by a licensed professional engineer or certified industrial hygienist.</p> <p>A copy of the certified summary test results must be submitted with the operating permit renewal application due at least 12 months prior to expiration of the Operating Permit.</p> <p>Emissions shall be reported in lb/hr, lb/MMBtu (HHV), and ppmvd @ 7% O₂ (for NO_x, CO, and VOC) and fuel sulfur content shall be reported in weight percent. [N.J.A.C. 7:27-22.18(e)] and [N.J.A.C. 7:27-22.18(h)]</p>

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
2	<p>Monthly sampling and analysis for heavy metal concentrations in No. 6 fuel oil. Samples of No. 6 fuel oil supplied to the boiler shall be taken in any month during which No. 6 fuel oil is combusted, and analyzed monthly or quarterly, at the discretion of the permittee, for arsenic, beryllium, cadmium, chromium (total), lead, manganese, mercury, nickel, phosphorous and selenium. A 4 quarter weighted average shall be calculated for each of these constituents. Fuel analysis is not required for quarters during which no No. 6 oil is combusted. [N.J.A.C. 7:27-22.16(a)]</p>	<p>Monitored by fuel sampling (e.g. oil) each month during operation on #6 fuel oil.</p> <p>A sample of #6 fuel oil shall be taken from the fuel supply to the boiler in any month during which No. 6 fuel is combusted. Samples shall be either analyzed individually, with the results from all quarterly samples being averaged, or composited and analyzed quarterly, to represent the fuel quality for that quarter. A quarterly average shall be obtained for any quarter during which No. 6 fuel oil is combusted. Fuel analysis is not required for quarters in which No. 6 fuel oil is not combusted. A weighted rolling average for each period of four consecutive quarters shall be calculated at the end of each quarter for that quarter and the three quarters preceding it, using the analysis results and total fuel use representing each quarter.</p> <p>Sampling and analysis shall be conducted according to USEPA SW846 methodologies or a comparable test method approved by the USEPA and the Department. All analyses shall be conducted by a certified lab. [N.J.A.C. 7:27-22.16(e)]</p>	<p>Recordkeeping by certified lab analysis results upon occurrence of event. Results of monthly or quarterly lab analysis shall be maintained. Quarters shall begin on January 1, April 1, July 1, and October 1 of each year. [N.J.A.C. 7:27-22.16(o)]</p>	<p>Submit a report. As per the approved schedule: Once per quarter (three months). Quarters shall begin on January 1, April 1, July 1, and October 1 of each year. Analyses of the HAP metals concentrations of the #6 fuel oil fed into the boiler shall be submitted quarterly, within 45 calendar days after the end of each calendar quarter, to the Southern Regional Enforcement Office per N.J.A.C. 7:27-22.18 and 22.19. [N.J.A.C. 7:27-22.16(o)]</p>
	<p>All operating scenarios related to unit 10 are valid through August 31, 2012 only. Operation of the unit 10 boiler on or after September 1, 2012 is not permitted. [N.J.A.C. 7:27-22.16(a)]</p>	<p>None.</p>	<p>None.</p>	<p>None.</p>
	<p>Opacity \leq 20%. No visible emissions greater than 20% opacity, exclusive of condensed water vapor, except for a period of not longer than three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-3.2(b)] & [N.J.A.C. 7:27-3.2(c)]</p>	<p>Opacity: Monitored by continuous opacity monitoring system continuously based on any 30 minute block. [N.J.A.C. 7:27-3.2(b)] & [N.J.A.C. 7:27-3.2(c)]</p>	<p>Opacity: Recordkeeping by data acquisition system (DAS) / electronic data storage continuously [N.J.A.C. 7:27-3.2(a)] & [N.J.A.C. 7:27-3.2(e)]</p>	<p>Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding quarter year (the quarter years begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal. [N.J.A.C. 7:27-22.16(o)]</p>

BOP110001

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U10 357 MMBtu/hr utility boiler - wall (face) fired - coal or No.6 fuel oil fired
Operating Scenario: OS2 Operation of Unit 10 boiler burning No. 6 fuel oil (with No. 2 fuel oil for ignition)

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	This operating scenario is valid through August 31, 2012 only. Operation of the unit 10 boiler on or after September 1, 2012 is not permitted. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	Maximum allowable sulfur dioxide emissions based on #6 fuel oil and geographical zone. $SO_2 \leftarrow 2.1 \text{ lb/MMBTU}$. [N.J.A.C. 7:27-9.2(e)]	SO_2 : Monitored by stack emission testing at the approved frequency, based on any 60 minute period. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-22.16(e)]	SO_2 : Recordkeeping by stack test results at the approved frequency. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-22.16(e)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-22.16(e)]
3	$NO_x \text{ (Total)} \leftarrow 0.28 \text{ lb/MMBTU}$. Maximum NO_x emission rate. [N.J.A.C. 7:27-19.4(a)]	$NO_x \text{ (Total)}$: Monitored by continuous emission monitoring system continuously, based on a calendar day (in ozone season) or 30 day rolling (at other times) average. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-19.15] and. [N.J.A.C. 7:27-19.18]	$NO_x \text{ (Total)}$: Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-19.15] and. [N.J.A.C. 7:27-19.18]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding quarter year (the quarter years begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal. [N.J.A.C. 7:27-22.16(e)]
4	All air pollution control apparatus designated for use during this operating scenario (as listed below) must be operating when No. 6 fuel oil is combusted: 1) Low NO_x Burners 2) Over-fired air ports 3) Mechanical Collector (Particulates) 4) Research Cottrell Electrostatic Precipitator 5) Environmental Elements Electrostatic Precipitator [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
5	$NO_x \text{ (Total)} \leftarrow 170 \text{ ppmvd @ 7\% } O_2$. Maximum concentration of NO_x emissions. [N.J.A.C. 7:27-22.16(a)]	$NO_x \text{ (Total)}$: Monitored by continuous emission monitoring system continuously, based on a calendar day (in ozone season) or 30 day rolling (at other times) average. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-22.16(a)]	$NO_x \text{ (Total)}$: Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-22.16(a)]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding quarter year (the quarter years begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal. [N.J.A.C. 7:27-22.16(e)]

BOP110001

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U10 357 MMBtu/hr utility boiler - wall (face) fired - coal or No.6 fuel oil fired
Operating Scenario: OS3 Start-up / Shutdown using No.2 fuel oil, with coal or No.6 fuel oil below 45% load.

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	This operating scenario is valid through August 31, 2012 only. Operation of the unit 10 boiler on or after September 1, 2012 is not permitted. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	Start-up is defined as the period from initiation of fuel combustion until the unit reaches 45 percent of full load. The duration of the exemption from N.J.A.C. 7:27-22.16 emission limits during start-up shall not exceed 12 hours. [N.J.A.C. 7:27-22.16(e)]	Monitored by hour/time monitor continuously. [N.J.A.C. 7:27-22.16(e)]	Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. [N.J.A.C. 7:27-22.16(e)]	None.
3	Shut-down is defined as the period from initial lowering of the unit output below 45 percent of full load until the cessation of fuel combustion. The duration of the exemption from N.J.A.C. 7:27-22.16 emission limits during shut-down shall not exceed 3 hours. [N.J.A.C. 7:27-22.16(e)]	Monitored by hour/time monitor continuously. [N.J.A.C. 7:27-22.16(e)]	Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. [N.J.A.C. 7:27-22.16(e)]	None.
4	NO _x (Total) ≤ 0.28 lb/MMBTU. Maximum NO _x emission rate. [N.J.A.C. 7:27-19.4(e)]	NO _x (Total): Monitored by continuous emission monitoring system continuously, based on a calendar day (in ozone season) or 30-day rolling (at other times) average. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-19.15] and. [N.J.A.C. 7:27-19.18]	NO _x (Total): Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. (See U10, OS Summary, Ref. #1). [N.J.A.C. 7:27-19.15] and. [N.J.A.C. 7:27-19.18]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding quarter year (the quarter years begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal. [N.J.A.C. 7:27-22.16(e)]
5	All Permit requirements contained in OS Summary shall apply during Start-up and Shut-down as defined in this operating scenario. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

BOP110001

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U22 Emergency Generator

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	NO _x (Total) ≤ 3.5 tons/yr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	CO ≤ 0.68 tons/yr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
3	VOC (Total) ≤ 0.23 tons/yr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
4	SO ₂ ≤ 0.18 tons/yr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
5	TSP ≤ 0.33 tons/yr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
6	PM-10 (Total) ≤ 0.33 tons/yr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
7	Pb ≤ 0.003 tons/yr. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

New Jersey Department of Environmental Protection
 Emission Unit/Batch Process Inventory

U 10 Unit 10 357 MMBtu/hr utility boiler - wall (face) fired - coal or No.6 fuel oil fired

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
S2	10-No.6 oil	Operation of Unit 10 boiler burning No. 6 fuel oil (with No. 2 fuel oil for ignition)	Normal - Steady State	E10	CD1 (P) CD2 (P) CD4 (P) CD6 (S) CD7 (T)	PT10	1-01-004-01 1-01-005-01	0.0	8,760.0		50,000.0	150,000.0	260.0	325.0
33	SU/SD	Start-up / Shutdown using No.2 fuel oil, with coal or No.6 fuel oil below 45% load.	Startup	E10		PT10								

~~U 11 Unit No. 11 Gas Turbine Unit No. 11~~

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
	Turbine - NG	Unit No. 11 Firing Natural Gas	Normal - Steady State	E11	CD19 (P) CD20 (P)	PT11	2-01-001-02 2-01-002-01	0.0	8,760.0		643,417.0	754,623.0	200.0	750.0
	Turbine - FO	Unit No. 11 Firing Ultra Low Sulfur Distillate Fuel	Normal - Steady State	E11	CD19 (P) CD20 (P)	PT11	2-01-001-01	0.0	500.0		626,831.0	753,082.0		750.0

Date: 9/27/2011

INELAND MUNICIPAL ELEC UTIL HOWARD M. DOWN (75507)
 OP110001

New Jersey Department of Environmental Protection
 Emission Unit/Batch Process Inventory

22 Emer Gen Emergency Generator

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
JS1	Emer. Gen.	Emergency power generation through firing of No. 2 FO	Normal - Steady State	E22		PT22	2-01-001-02	0.0	8,760.0		450.0	1,000.0	200.0	400.0