

**SALEM COUNTY IMPROVEMENT AUTHORITY
RESOLUTION 2022-80**

September 8, 2022

**RESOLUTION OF THE SALEM COUNTY IMPROVEMENT AUTHORITY
AUTHORIZING PREPARATION OF A FACILITY-WIDE RISK ASSESSMENT
PROTOCOL REGARDING THE TITLE V PERMIT RENEWAL**

WHEREAS, during the application process for renewal of the Title V Permit, the NJDEP has determined that a Facility-Wide Risk Assessment with air contaminant modeling is required; and

WHEREAS, quotes were obtained and the lowest quote was from SCS Engineers in the amount of \$11,400 for Task 1 on the attached proposal; and

WHEREAS, funds are available in the full amount of the cost of this work same have been certified by the Certifying Financial Officer;

Vendor: SCS Engineers


Account Number	Amount	Department Description
01-04-115-430	\$11,400.00	Title V Engineer

NOW, THEREFORE, BE IT RESOLVED that the Executive Director is authorized to commence work on the development of the risk assessment protocol as described in Task 1 of the attached proposal.

ATTEST:



Barry Davis, Secretary



Cordy Taylor, Chairman

CERTIFICATION

I hereby certify the above to be a true copy of a resolution adopted by the Salem County Improvement Authority Board at their regular meeting held September 8, 2022.



Barry Davis, Secretary

August 12, 2022
File No. 02018820.05

Ms. Julie Acton, Executive Director
Salem County Improvement Authority
286 Welchville Road, PO Box 890
Alloway, New Jersey 08001

Subject: Title V Permit Renewal Services Proposal
Risk Assessment/Air Modeling and Response to Comments on Permit
Salem County Solid Waste Facility

Dear Julie:

As you may recall, SCS Engineers submitted your facility's Title V permit renewal application in April 2020, as required by New Jersey regulations. The New Jersey Department of Environmental Protection (NJDEP) issued a letter of Administrative Completeness – With Application Shield on May 12, 2020. This letter acknowledges that your obligation to submit the permit application on the required schedule was met and your facility is authorized to continue its operations under the application shield until NJDEP issues a new permit.

Recently, NJDEP began processing your renewal application and as part of that process, has determined that a Facility-Wide Risk Assessment with air contaminant modeling is required. The risk assessment is required for all Title V renewal permits if any of the hazardous air pollutants (HAPs) emitted from the facility are above NJDEP's reporting thresholds, as specified in NJ Administrative Code 7:27-17.9. Based on a review of landfill fugitive emissions and flare emissions, there are a limited number of HAPs emission rates that are above their respective reporting thresholds.

The risk assessment process includes the development of a risk assessment protocol for NJDEP review and approval, performance of the protocol with air modeling, and reporting of results. The purpose of the risk assessment is to estimate the probability of adverse health effects resulting from human exposure to hazardous substances. The NJDEP utilizes the risk assessment to evaluate potential air toxics risks from the facility and make decisions regarding permitting, control and/or regulation of air toxics.

SCOPE OF SERVICES

This proposal is being submitted to prepare the risk assessment protocol and gain NJDEP approval of the protocol. Subsequent tasks will include performing the risk assessment (including air modeling) and negotiating permit conditions with NJDEP after the Department issues a pre-draft permit. These subsequent tasks are briefly described below but not budgeted at this time. Final scopes and budgets will be provided after protocol approval.

Task 1: Preparation of a Facility-Wide Risk Assessment Protocol

SCS will prepare a Facility-Wide Risk Assessment Protocol as required by NJDEP for the Department's approval. The protocol will be prepared in accordance with the Department's Technical Manual 1002



entitled "Guidance on Preparing an Air Quality Modeling Protocol" and Technical Manual 1003 "Guidance on Preparing a Risk Assessment for Air Contaminant Emissions."

The risk assessment protocol includes site plans, identification and discussion of the sources of HAPs at the facility, the HAPs emissions to be modeled, a land use analysis, a stack height analysis for the emission sources, review of meteorological data, the determination of compound emission rates and risk assessment emission rate thresholds, a discussion of the proposed air quality model and modeling approach to be used, and the identification of sensitive receptors in the area.

Task 2: Performance of the Risk Assessment/Air Quality Modeling

After NJDEP approval of the modeling protocol, SCS will perform the air quality modelling and prepare a risk assessment report.

Task 3: Negotiate Air Permit Conditions

After NJDEP accepts and approves the risk assessment and air contaminant modeling results, the Department will proceed with processing the Title V permit renewal application. Once a NJDEP issues one or more pre-draft permits, SCS will assist the Authority in the review of each and prepare comments to NJDEP. As of late, we are seeing an industry-wide delay in finalizing new permits largely due to the time NJDEP takes to respond to comments and the need to review several versions of the pre-draft permit before we can agree to its contents.

FEE AND SCHEDULE

We propose to perform this project on a time and materials basis in accordance with our current fee schedule. We will not exceed the budget without your prior approval. We are available to begin work on the protocol upon approval of the proposal.

Task	Description	Budget Amount
1	Facility-Wide Risk Assessment Protocol	\$11,400
2	Performance of Risk Assessment/Air Quality Modeling	TBD
3	Negotiate Air Permit Conditions	TBD

We appreciate this opportunity to support you on this project. If you have any questions, please feel free to contact either of us.

Sincerely,



Julie Bethke
Senior Project Professional
SCS Engineers



Eric R. Peterson, PE
Vice President
SCS Engineers