

SALEM COUNTY IMPROVEMENT AUTHORITY

RESOLUTION 2023-70

June 8, 2023

**RESOLUTION OF THE SALEM COUNTY IMPROVEMENT AUTHORITY  
AUTHORIZING ADDITION OF NEW TANA SHREDDER TO THE NJDEP TITLE V  
RENEWAL APPLICATION**

WHEREAS, SCS Engineers submitted to the NJDEP the Salem County Improvement Authority (SCIA) Title V Renewal application in April 2020; and

WHEREAS, during SCIA's recent air enforcement inspection, we learned that the application review is still ongoing with no target date for its completion; and

WHEREAS, to add a new shredder, it will be necessary to submit a separate Significant Modification application and risk evaluation; and

WHEREAS, once the application is submitted, SCIA can request that the application be processed separately from (and ahead of) the Title V renewal to expedite approval to use the equipment; and

WHEREAS, pursuant to Resolution 2023-32, SCS Engineers ("SCS") has submitted qualifications and was approved by the Board through a fair and open process to render the type of engineering services identified in this project; and

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

Vendor: SCS Engineers

Account Number

01-04-115-430

Amount

\$14,500.00

Department Description

Title V Engineer

NOW, THEREFORE, BE IT RESOLVED that the Executive Director and SCS Engineers are authorized to commence work on the air permitting for the new shredder as described in the attached proposal.

ATTEST:



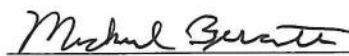
Michael Bercute, Alt. Treasurer/Secretary



Susan Bestwick, Chairperson

**CERTIFICATION**

I certify that the foregoing is a true copy of a Resolution adopted by the Salem County Improvement Authority at a meeting thereof held on June 8, 2023.



Michael Bercute, Alt. Treasurer/Secretary

June 5, 2023  
File No. 02218820.05

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

Subject: Title V Permitting for New Grinder Equipment  
Salem County Solid Waste Facility

Dear Julie:

Presented below is our proposal to provide air permitting services to add a new grinder to the facility's Title V permit. Upon review of the proposed equipment specifications, SCS determined that the new equipment would be considered a significant source operation that would need to be added to the Title V permit as a Significant Modification.

As you know, NJDEP began processing your Title V Renewal application in the fall and during your recent air enforcement inspection, we learned that the application review is still ongoing with no target date for its completion. To add a new grinder, it will be necessary to submit a separate Significant Modification application and risk evaluation. Once the application is submitted, we can request that the application be processed separately from (and ahead of) the Title V renewal to expedite approval to use the equipment.

## SCOPE OF SERVICES

The tasks associated with permitting of a new grinder include preparation the air permit application, assessment of risk from the new equipment and negotiating air permit conditions. These tasks are detailed below.

### Task 1: Preparation of Significant Modification Application

SCS will prepare a Significant Modification Application for submittal to NJDEP. The application process will include the following:

- Review equipment specifications.
- Prepare potential-to-emit calculations for emissions from the grinder engine and grinding operation.
- Perform a first-level risk screening for diesel particulate matter from the grinder engine.
- Prepare materials for NJDEP's second-level risk assessment for the grinder's operation in accordance with the specifications provided in the Department's Technical Manual 1003 "*Guidance on Preparing a Risk Assessment for Air Contaminant Emissions.*", if necessary.
- Create an electronic RADIUS application file.
- Submit the complete application package to NJDEP via the web-based NJDEP Online system.



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The proposed fee for the preparation of the significant modification application is \$8,000 as per our approved contract rate for this activity.

## Task 2: Negotiate Air Permit Conditions

After NJDEP accepts the permit application and risk assessment materials, SCS will work with the Authority and NJDEP to negotiate permit conditions. The NJDEP will likely issue more than one pre-draft permit that we will review and provide comments for revision.

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. Because it is difficult to predict the length of time and effort that will be required to usher NJDEP into finalizing the permit, we are proposing a time-and-materials budget not to exceed \$6,500. This amount assumes two pre-draft and one final draft versions of the permit requiring our review and comment. The actual amount billed will be based on the number of hours required to accomplish the task.

## BUDGET AND SCHEDULE

The total proposed budget for air permitting services for the grinder equipment is \$14,500. We are available to begin work on the permit application upon approval of the proposal.

If you have any questions, please feel free to contact either of us.

Sincerely,



Julie Bethke  
Project Manager  
SCS Engineers



Eric R. Peterson, PE  
Vice President  
SCS Engineers