



State of New Jersey

Department of Environmental Protection

Air Quality, Energy and Sustainability

Division of Air Quality

Bureau of Stationary Sources

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PHILIP D. MURPHY

Governor

SHEILA Y. OLIVER

Lt. Governor

SHAWN M. LATOURETTE

COMMISSIONER

December 20, 2021

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Andrew Urquhart

Manager

Competitive Power Ventures

50 Braintree Hill Office Park, #300

Braintree, MA 02184

Re: FOURTH NOTICE OF TECHNICAL DEFICIENCIES: TITLE V SIGNIFICANT MODIFICATION

Woodbridge Energy Center (Keasbey Energy Center Project)

Permit Activity Number: BOP160004

Program Interest Number: 18940

Application Submitted August 21, 2016

Dear Mr. Urquhart:

Thank you for your letter dated December 3, 2021, requesting an extension to respond to the Department's Fourth Notice of Deficiency ("Fourth Notice") for the above-referenced application. In the Fourth Notice, the Department identified three areas where your application is incomplete and needed to be addressed in a written submission by September 30, 2021: the emission offset demonstration; air dispersion modeling; and miscellaneous information in the project's RADIUS application. In your letter, you agreed to correct these deficiencies. As to the emission offset demonstration, the Department would like to reiterate what information is required, as explained before and most recently in the Fourth Notice. If you choose not to utilize the CER02 form, you must provide *all equivalent information* so that the Department can determine compliance with the emission offset rules at N.J.A.C. 7:27-18. If you choose to submit a certification by a responsible corporate official, the official must certify to the equivalent information in the CER02 form. In lieu of the seller's signature, the responsible corporate official must specify the offsets, and must certify that the specified offsets are to be and will be applied to the project and will be secured prior to operation. In your September 20, 2021 letter, you provided us with a draft template for how you will submit the information. If the information and certification is provided as shown in that template, it would satisfy our requirement to identify emission offsets. We are also evaluating the RADIUS information provided in your September 20, 2021. We will contact you if we require more information regarding those forms.

In your letter, you requested an extension to the end of January 2022 to provide the required information. Given the amount of time this application has been pending, which necessitated the need for updated air dispersion modeling, and the fact that the Multisource Modeling Protocol was approved on November 22, 2021, the Department is granting an extension. You must provide the required information by January 31, 2022. Please note again that failure to submit the required information by the deadline is grounds for denial of the Title V Significant Modification application pursuant to N.J.A.C 7:27-22.3(ff). Alternatively, you can withdraw the pending application BOP160004.

If you have any questions regarding this matter or wish to schedule a meeting to discuss the air dispersion modeling, please call me at (609) 633-1129.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Owen". The signature is fluid and cursive, with the first name "David" and last name "Owen" clearly distinguishable.

David J. Owen
Bureau of Stationary Sources

C: A. Khan
 J. Leon
 Central Regional Office
 C. Bergeron, Woodbridge Energy Center