October 23, 2019

Via Email and USPS

Attorney General Gurbir S. Grewal
Office of the Attorney General
State of New Jersey
RJ Hughes Justice Complex
25 Market Street, Box 093
Trenton, NJ 08625-0093
Email: citizen.services@njoag.gov

Re: Ongoing Air Emissions Violations by Covanta Essex Company

Dear Attorney General Grewal:

On behalf of the Ironbound Community Corporation (ICC), Earthjustice and the Environmental Advocacy Clinic at Vermont Law School request that the Office of the Attorney General investigate and take enforcement action against the Covanta Essex Company (Covanta) for violations of the air and waste permit of the Essex County Resource Recovery Facility (Incinerator) located in the Ironbound community of Newark, New Jersey. The Incinerator's repeated and ongoing solid waste and air emissions violations—including the recent pink and purple smokestack emissions that have garnered much media attention—threaten public health and the environment. We urge the Office of the Attorney General to enforce the New Jersey Air Pollution Control Act, N.J.S.A. 26:2C-1 *et seq.*, the New Jersey Solid Waste Management Act, N.J.S.A.13:1E *et seq.*, and the Clean Air Act, 42 U.S.C. § 7401 *et seq.*, against the Incinerator. We also ask that the Office of the Attorney General enjoin the Incinerator from operation until it takes all necessary actions to come into compliance with state and federal regulations and the terms of its operating permits. We kindly request a prompt meeting with the Office of the Attorney General to discuss these matters.

The Office of the Attorney General is tasked with enforcing New Jersey's environmental laws and protecting the health and welfare of Newark residents, especially environmental justice communities like the Ironbound—a densely populated, multi-ethnic, largely working-class community that is among the most polluted in the nation. The Incinerator is one of over 3,500 facilities with environmental permits located within the two zip codes that cover the Ironbound

community.[1] The U.S. Environmental Protection Agency's (EPA's) EJSCREEN database indicates the Ironbound is in the 80th and 90th percentiles for nearly every environmental justice variable—including PM2.5, ozone, diesel PM, air toxic cancer risk, respiratory hazard index, and wastewater discharge—regardless of whether the reference for comparison is the State, EPA Region 2, or the U.S.[2]

ICC appreciates the Office of the Attorney General's recent enforcement actions against polluting facilities in the Ironbound neighborhood and your commitment to protecting environmental justice communities.[3] Covanta's emissions are injurious to the health and welfare of the people of the Ironbound and unreasonably interfere with their enjoyment of life and property. The Ironbound community has long suffered from the impacts of polluting facilities like Covanta that, as the Attorney General recently stated, "think they can pollute the air we breathe and get away with it."[4]

Since the Incinerator began operations in 1990, the facility has had repeated emissions violations, which continued after Covanta took over operations in 2005. In 2009, ICC filed a Clean Air Act citizen suit and Title V permit petition with the Environmental Protection Agency (EPA).[5] This advocacy eventually led the company to install new pollution control equipment.[6] Despite these upgrades, the Incinerator has continued to violate its emission limits, among other air permit conditions.

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[1] *See* N.J. Dep't of Envtl. Protection, DataMiner, https://www13.state.nj.us/DataMiner (follow "search by site" then "search by ZIP code") (last visited Oct. 22, 2019).

[2] *See* Attachment, EPA, EJSCREEN Report (Version 2018) The User Specified Area, New Jersey, EPA Region 2 (attached hereto as Attachment 1).

[3] Press Release, Office of the Attorney General, NJDEP, Attorney General, DEP Announce Enforcement Action against Plant in Ironbound Releasing "Putrid" Odors Affecting Local Community (Sept. 19, 2019), https://www.nj.gov/oag/newsreleases19/pr20190919a.html; Press Release, Office of the Attorney General, DEP File Lawsuits Across New Jersey Targeting Polluters in Lower-Income and Minority Communities (Dec. 6, 2018), https://www.nj.gov/oag/newsreleases18/pr20181206a.html.

[4] Press Release, Office of the Attorney General, NJDEP (Sept. 19, 2019), *supra* note 3.

[5] *See* Tom Johnson, *Energy-from-Waste Facility Agrees to Clean Up its Act*, NJ Spotlight (Oct. 4, 2010), https://www.njspotlight.com/2010/10/10-1003-1512/; *see also* Eric Kiefer, *Essex County Trash Incinerator Unfairly Burdens Poor, Critics Say*, Patch (July 8, 2019), https://patch.com/new-jersey/newarknj/essex-county-trash-incinerator-unfairly-burdens-poor-critics-say; Complaint, *Ironbound Community Corp. v. Covanta Essex Co.*, No. 209CV00770, 2009 WL 770294 (D.N.J. Feb. 20, 2009).

[6] *Id.*; Press Release, NJDEP, Christie Administration Announces Completion of Major Project to Improve Emissions From Newark Waste-to-Energy Plant (Dec. 22, 2016), https://www.nj.gov/dep/newsrel/2016/16_0126.htm.

Covanta's continued violations have grown particularly noticeable this year as Newark residents and the media have documented emissions tinted pink or purple emanating from the Incinerator's smokestack:

The media has reported these pink and purple emissions billowing at least four times in the past five months.[7] Information from the New Jersey Department of Environmental Protection (NJDEP) Dataminer website and Covanta's compliance reports suggest that at least nine other incidents of purple emissions occurred between January 2015 and January 2019—all of which were associated with permit violations.[8] The frequency of these pink and purple plumes appears to be increasing: ICC is aware of only one day with purple plumes in 2015, and two days in each year from 2016 to 2018, but the Incinerator appears to have at least six incidents of purple plumes in 2019, and counting. Over the past few months, ICC has asked for more information from NJDEP about these tinted plumes, but neither Covanta nor NJDEP have provided adequate information to ICC or the public about the source of the emissions or any investigation of the incidents.

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[7] *See e.g.* Paul Milo, *Strange Pink Smoke Seen Wafting from Stack in Newark,* Daily Voice (June 20, 2019), https://dailyvoice.com/new-jersey/essex/news/strange-pink-smoke-seen-wafting-from-stack-in-newark/770572/; Eric Kiefer, *Newark Trash Incinerator Seen Spewing Purple Smoke…Again,* Patch (Oct. 10, 2019), https://patch.com/new-jersey/newarknj/newark-trash-incinerator-seen-spewing-purple-smoke-again; Eric Kiefer, *More Weird, Colorful Smoke Seen at Newark Trash Incinerator,* Patch (Sep. 23, 2019), https://patch.com/new-jersey/newarknj/more-weird-colorful-smoke-seen-newark-trash-incinerator; Karin Yi & Chris Sheldon, *Did you see the pink smoke over Newark today? We checked it out. Here's what happened.*, NJ.com (June 20, 2019), https://www.nj.com/news/2019/06/did-you-see-the-pink-smoke-over-newark-today-we-checked-it-out-heres-what-happened.html; CBS2 News at 6, *Strange Pink Smoke Seen at Newark Factory,* CBS New York (June 19, 2019) https://newyork.cbslocal.com/video/4108400-strange-pink-smoke-seen-at-newark-factory/.

[8] *See* Attachment, Summary of Violations (attached hereto as Attachment 2).

Covanta states that these tinted plumes may be caused by the burning of iodine present in the waste stream.[9] Burning iodine risks serious adverse health effects, given that its inhalation can lead to lung irritation that causes coughing and/or shortness of breath, and higher exposure may cause a buildup of fluid in the lungs (pulmonary edema), a medical emergency causing severe shortness of breath.[10] Other effects from iodine exposure may include skin irritation, bronchitis, thyroid gland disturbances, and high exposure to iodine may affect the liver and kidneys.[11]

Covanta claims that the iodine is entering its waste stream as part of "regular trash delivery,"[12] and that it has taken corrective action by "increasing inspections and mixing of waste and alert[ing] customers not to dispose of iodine in waste."[13] Covanta's "corrective action" has been insufficient, however, since the instances of tinted plumes appear to be growing more frequent, not less. The increasing frequency and long duration of these tinted plumes—the two purple plumes reported in January 2019 lasted for 1-2 hours, for example—casts doubt on Covanta's assertion that these tinted plumes are part of the normal course of trash delivery.

ICC is gravely concerned that these plumes indicate that Covanta may be burning unauthorized medical waste and that, as a result, the Ironbound community is being exposed to hazardous medical waste pollutants in addition to iodine. The violations raise red flags about the Incinerator's compliance with its solid waste permit, the provisions of the New Jersey Solid Waste Management Act (SWMA), N.J.S.A. 13:1E-1 *et seq*., and its accompanying regulations at N.J.A.C. 7:26-1 *et seq*. Unlike other types of stationary sources, the fuel burned in waste incinerators is highly variable, and this variation can directly affect their air emissions moment to moment.[14] Covanta's solid waste permit specifically prohibits the Incinerator from accepting and incinerating regulated medical and hazardous waste, and requires the Incinerator to inspect incoming waste "in order to identify and remedy any problems" in accordance with a "Waste Flow Control Plan," and to maintain records of waste received.[15] The ongoing and repeated air emissions violations suggest that the Incinerator is failing to detect and remove unauthorized and prohibited wastes, such as

[9] *See* Kiefer, *supra* note 8; Covanta Essex Co., Semi-Annual Report for July 1, 2018 Through December 31, 2018 and Annual Report for Calendar Year 2018, Title V Permit Program Interest Number 07736 (Jan. 2019) ("2018 Annual Report").

[10] New Jersey's Hazardous Substance Fact Sheet for iodine indicates that iodine can have adverse effects on human health when inhaled. Hazardous Substance Fact Sheet: Iodine, New Jersey Department of Health (2016) https://nj.gov/health/eoh/rtkweb/documents/fs/1026.pdf.

[11] *Id.*

[12] Kiefer, *supra* note 8.

[13] *See, e.g.*, 2018 Annual Report, *supra* note 10, at 3.

[14] *See* U.S. Envt'l Prot. Agency, AP-42, Compilation of Air Emissions Factors, at 2.1-12 to 2.1-14, https://www3.epa.gov/ttn/chief/ap42/ch02/final/c02s01.pdf (noting that emissions form solid waste combustors can be "highly variable" and dependent on "waste characteristics").

[15] NJDEP, Covanta Essex Co. Solid Waste Facility Permit at I-5, Permit No. RRF170002 (Feb. 23, 2016).

iodine, from the waste stream before burning. We therefore urge the Office of the Attorney General to conduct an investigation to determine the source of the unauthorized waste and take enforcement against the Incinerator for these ongoing violations.

As conspicuous as these pink and purple emissions may be, Covanta's permit violations go well beyond these instances of tinted plumes and are part of a long history of noncompliance. The Incinerator has reported nearly 300 violations of its air permit emissions limits since the renewal of its latest permit on October 28, 2013.[16] This includes approximately 200 particulate matter (opacity) violations, 38 carbon monoxide violations—some nearly 20 times the permit limit—14 O2 violations, seven SO2 violations, and three NOx violations. Even after the installation of the baghouse in 2016, Covanta reported over 40 particulate matter violations. Covanta's "corrective action" for *all* emissions violations—and not just those associated with the tinted plume—have been ineffective at remedying these unpermitted emissions.

ICC is alarmed by these repeated violations and is contemplating taking corrective legal action. We urge the Office of the Attorney General to similarly investigate and take enforcement action, and kindly request a prompt meeting to discuss the matter further. Thank you for your consideration and prompt attention to this issue.

Sincerely,

/s/ Jonathan Smith
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Victoria Bogdan Tejeda
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On behalf of the Ironbound Community Corporation

Attachments: EJSCREEN Report; Summary of Violations

CC: Aaron Kleinbaum,
Assistant Attorney General for Environmental Enforcement and Environmental Justice

Catherine McCabe, Commissioner, New Jersey Department of Environmental Protection

[16] *See* Attachment 2, *supra* note 9.

Attachment 1

EJSCREEN Report (Version 2018)

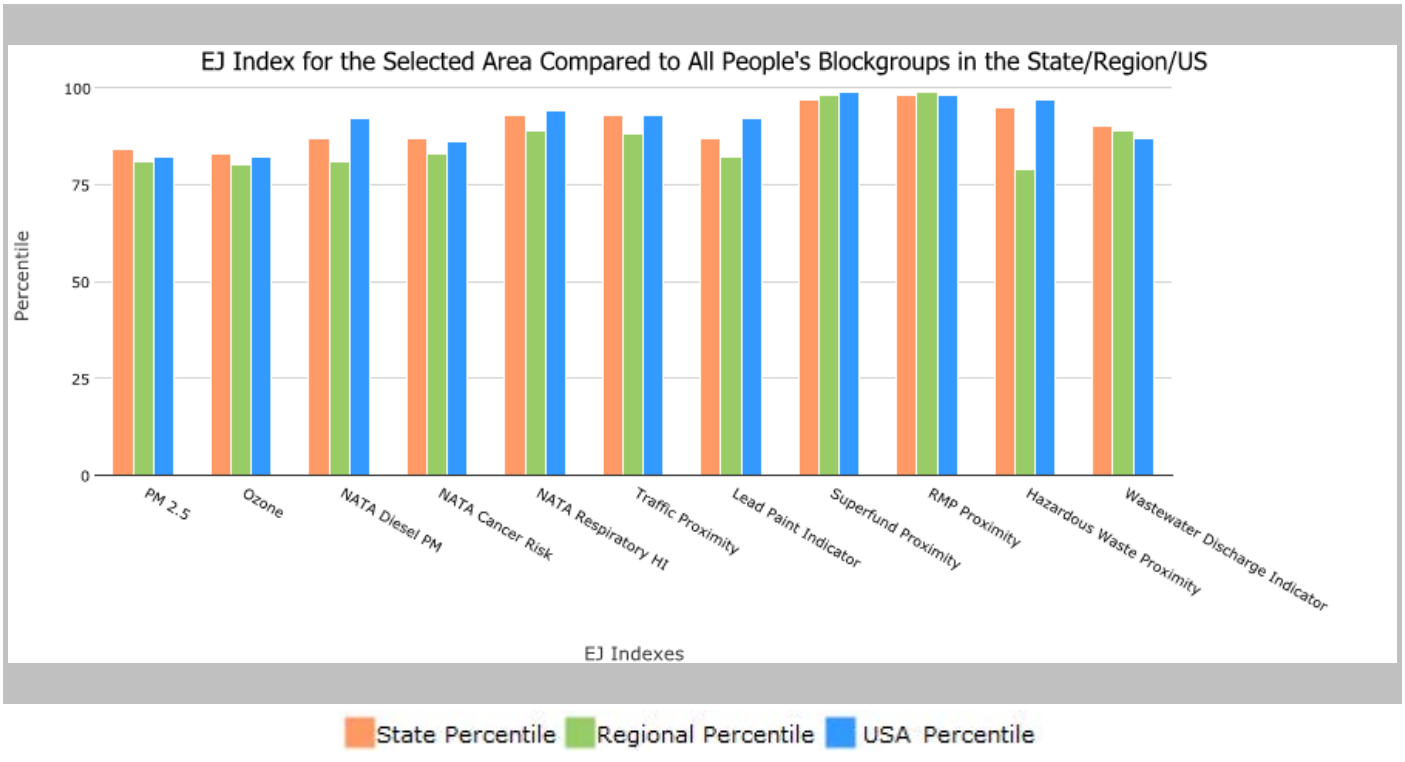
the User Specified Area, NEW JERSEY, EPA Region 2

Approximate Population: 58,611

Input Area (sq. miles): 6.69

Ironbound

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	84	81	82
EJ Index for Ozone	83	80	82
EJ Index for NATA* Diesel PM	87	81	92
EJ Index for NATA* Air Toxics Cancer Risk	87	83	86
EJ Index for NATA* Respiratory Hazard Index	93	89	94
EJ Index for Traffic Proximity and Volume	93	88	93
EJ Index for Lead Paint Indicator	87	82	92
EJ Index for Superfund Proximity	97	98	99
EJ Index for RMP Proximity	98	99	98
EJ Index for Hazardous Waste Proximity	95	79	97
EJ Index for Wastewater Discharge Indicator	90	89	87



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

EJSCREEN Report (Version 2018)

the User Specified Area, NEW JERSEY, EPA Region 2

Approximate Population: 58,611

Input Area (sq. miles): 6.69

Ironbound

Sites reporting to EPA	
Superfund NPL	2
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	19

EJSCREEN Report (Version 2018)

the User Specified Area, NEW JERSEY, EPA Region 2

Approximate Population: 58,611

Input Area (sq. miles): 6.69

Ironbound

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m^3)	9.8	9.43	77	9.21	69	9.53	53
Ozone (ppb)	42	43.6	17	41.9	47	42.5	44
NATA* Diesel PM (µg/m^3)	2.3	1.31	88	1.88	70-80th	0.938	95-100th
NATA* Cancer Risk (lifetime risk per million)	58	42	94	44	80-90th	40	90-95th
NATA* Respiratory Hazard Index	5.1	2.1	98	2.4	95-100th	1.8	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	1600	660	89	1800	79	600	91
Lead Paint Indicator (% Pre-1960 Housing)	0.6	0.41	68	0.51	56	0.29	82
Superfund Proximity (site count/km distance)	2.1	0.43	97	0.28	98	0.12	99
RMP Proximity (facility count/km distance)	6	0.71	99	0.57	99	0.72	99
Hazardous Waste Proximity (facility count/km distance)	18	4.9	94	34	71	4.3	97
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0012	0.66	85	1.1	75	30	69
Demographic Indicators							
Demographic Index	56%	34%	79	37%	74	36%	79
Minority Population	68%	43%	73	44%	70	38%	78
Low Income Population	49%	25%	86	30%	80	34%	76
Linguistically Isolated Population	40%	7%	97	8%	96	4%	98
Population With Less Than High School Education	37%	11%	95	13%	93	13%	93
Population Under 5 years of age	7%	6%	66	6%	65	6%	61
Population over 64 years of age	7%	15%	17	15%	17	14%	20

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

For additional information, see: www.epa.gov/environmentaljustice

Attachment 2

Attachment 2: Summary of Violations

The following chart is a list of Covanta Essex Title V Permit violations that occurred under the current permit, issued October 28, 2013. The data represents violations compiled from NJDEP DataMiner reports between October 2013 and October 2019, as well as a portion of Covanta Essex's semiannual and annual compliance reports over this same period. Emissions exceedance more than twice the permit limit are listed in **bold and underlined**. Emissions exceedances known to be associated with a tinted plume are highlighted in purple.

This is a non-exhaustive list of violations, as DataMiner has no record of violations occurring after January 2019, and ICC does not have access to all of Covanta Essex's semiannual compliance reports for the relevant period. ICC may amend this list with information about additional violations as they become available. In addition, the media has reported pink or purple emissions from Covanta Essex on the following dates since January 2019. These emissions have not yet been published on DataMiner.

- June 19, 2019
- September 20, 2019
- October 9, 2019
- October 10, 2019

Covanta Essex Permit Violations: October 2013 - January 2019							
	Date	**Permit Emission Limit**	**Measured Exceedance**	**Ratio of Exceedance to Limit**	**Location**	**Notes**	**Violation Citation**
1	10/30/2013	6-minute 10% Opacity	12%	120%	Boiler #1		N.J.A.C. 7:27-22.16(e)
2	12/28/2013	1-hr SO2 94 ppmvd	115 ppm	122%	Boiler #2	Between 11:00 and 12:00 PM	N.J.A.C. 7:27-22.3(e)
3	1/3/2014	6-minute 10% Opacity	12%	120%	Unit #2		N.J.A.C. 7:27-22.16(e)
4	2/3/2014	6-minute 10% Opacity	12%	120%	Unit #2		N.J.A.C. 7:27-22.16(e)
5	2/3/2014	6-minute 10% Opacity	Violation (emission not listed)	n/a	Unit #3		N.J.A.C. 7:27-22.16(e)
6	2/3/2014	6-minute 10% Opacity	16%	160%	Unit #2		n/a
7	2/3/2014	6-minute 10% Opacity	14%	140%	Unit #2		n/a
8	2/3/2014	6-minute 10% Opacity	15%	150%	Unit #2		n/a
9	**2/3/2014**	**6-minute 10% Opacity**	**23%**	**230%**	**Unit #2**		**n/a**
10	2/3/2014	6-minute 10% Opacity	15%	150%	Unit #2		n/a
11	**2/3/2014**	**6-minute 10% Opacity**	**30%**	**300%**	**Unit #2**		**n/a**
12	**2/3/2014**	**6-minute 10% Opacity**	**26%**	**260%**	**Unit #2**		**n/a**
13	**2/3/2014**	**6-minute 10% Opacity**	**31%**	**310%**	**Unit #2**		**n/a**
14	2/3/2014	CO 100 ppmvd at 7% O2	129 ppm	129%	Unit #3		N.J.A.C. 7:27-22.16(e)
15	2/3/2014	CO 400 ppmvd at 7% O2	421 ppm	105%	Unit #3		N.J.A.C. 7:27-22.16(e)
16	2/3/2014	Maximum allowable opacity 10%	11%	110%	Unit #1		N.J.A.C. 7:27-22.16(e)

17	2/6/2014	Maximum allowable opacity 10%	13%	130%	Unit #1		N.J.A.C. 7:27-22.16(e)
18	2/27/2014	6-minute 10% Opacity	13%	130%	Unit #1		n/a
19	3/6/2014	Maximum allowable opacity 10%	17%	170%	Unit #3		N.J.A.C. 7:27-22.16(e)
20	3/6/2014	CO 400 ppmvd at 7% O2	575ppm	143%	Unit #3		N.J.A.C. 7:27-22.16(e)
21	3/6/2014	Oxygen (5-minute block) 3%	1.7%	57%	Unit #3		n/a
22	3/6/2014	CO 100 ppmvd at 7% O2	Violation (emission not listed)	n/a	Unit #3		N.J.A.C. 7:27-22.16(e)
23	**3/13/2014**	**Maximum allowable opacity 10%**	**23%**	**230%**	**Unit #1**		**N.J.A.C. 7:27-22.16(e)**
24	3/17/2014	Maximum allowable opacity 10%	12%	120%	Unit #2		N.J.A.C. 7:27-22.16(e)
25	3/23/2014	Maximum allowable opacity 10%	13%	130%	Unit #1		N.J.A.C. 7:27-22.16(e)
26	**3/25/2014**	**Maximum allowable opacity 10%**	**45%**	**450%**	**Unit #3**		**N.J.A.C. 7:27-22.16(e)**
27	**3/25/2014**	**6-minute 10% Opacity**	**29%**	**290%**	**Unit #3**		**n/a**
28	**3/25/2014**	**6-minute 10% Opacity**	**34%**	**340%**	**Unit #3**		**n/a**
29	**3/25/2014**	**6-minute 10% Opacity**	**33%**	**330%**	**Unit #3**		**n/a**
30	3/31/2014	6-minute 10% Opacity	16%	160%	Unit #1		n/a
31	3/31/2014	Maximum allowable opacity 10%	11%	110%	Unit #1		N.J.A.C. 7:27-22.16(e)
32	**4/2/2014**	**Maximum allowable opacity 10%**	**34%**	**340%**	**Unit #1**		**N.J.A.C. 7:27-22.16(e)**
33	**4/9/2014**	**Maximum allowable opacity 10%**	**22%**	**220%**	**Unit #1**		**N.J.A.C. 7:27-22.16(e)**
34	**4/9/2014**	**6-minute 10% Opacity**	**23%**	**230%**	**Unit #1**		**n/a**
35	4/9/2014	6-minute 10% Opacity	11%	110%	Unit #1		n/a
36	4/9/2014	6-minute 10% Opacity	13%	130%	Unit #1		n/a
37	4/9/2014	6-minute 10% Opacity	13%	130%	Unit #1		n/a
38	4/20/2014	CO 100 ppmvd at 7% O2	110 ppm	110%	Unit #3		N.J.A.C. 7:27-22.16(e)
39	5/26/2014	CO 100 ppmvd at 7% O2	104 ppm	104%	Unit #3		N.J.A.C. 7:27-22.16(e)

40	5/26/2014	Oxygen (5-minute block) 3%	2.5%	83%	Unit #3		n/a
41	10/20/2014	6-minute 10% Opacity	17%	170%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
42	11/10/2014	1-hr. CO emissions (400 ppmvd)	471 ppmvd	118%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
43	11/10/2014	4-hr. CO emissions (100 ppmvd)	151 ppmvd	151%	Boiler # 1		40 CFR 62.14104(a)
44	11/10/2014	6-minute 10% Opacity	12%	120%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
45	11/17/2014	6-minute 10% Opacity	11%	110%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
46	11/24/2014	6-minute 10% Opacity	14%	140%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
47	12/1/2014	6-minute 10% Opacity	11%	110%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
48	12/14/2014	6-minute 10% Opacity	17%	170%	Boiler # 1	Between 8:42 and 8:54 pm	N.J.A.C. 7:27-22.16(e)
49	**12/14/2014**	**6-minute 10% Opacity**	**31%**	**310%**	**Boiler # 1**	**Between 8:42 and 8:54 pm**	**N.J.A.C. 7:27-22.16(e)**
50	12/14/2014	6-minute 10% Opacity	11%	110%	Boiler # 1	Between 8:42 and 8:54 pm	N.J.A.C. 7:27-22.16(e)
51	12/16/2014	6-minute 10% Opacity	16%	160%	Boiler # 1	Between 2:54 and 3:12 pm	N.J.A.C. 7:27-22.16(e)
52	12/16/2014	6-minute 10% Opacity	13%	130%	Boiler # 1	Between 2:54 and 3:12 pm	N.J.A.C. 7:27-22.16(e)
53	12/16/2014	6-minute 10% Opacity	12%	120%	Boiler # 1	Between 2:54 and 3:12 pm	N.J.A.C. 7:27-22.16(e)
54	12/16/2014	6-minute 10% Opacity	15%	150%	Boiler # 2	Between 2:42 to 3:18 pm	N.J.A.C. 7:27-22.16(e)
55	**12/16/2014**	**6-minute 10% Opacity**	**21%**	**210%**	**Boiler # 2**	**Between 2:42 to 3:18 pm**	**N.J.A.C. 7:27-22.16(e)**
56	12/16/2014	6-minute 10% Opacity	17%	170%	Boiler # 2	Between 2:42 to 3:18 pm	N.J.A.C. 7:27-22.16(e)
57	12/16/2014	6-minute 10% Opacity	17%	170%	Boiler # 2	Between 2:42 to 3:18 pm	N.J.A.C. 7:27-22.16(e)
58	12/16/2014	6-minute 10% Opacity	15%	150%	Boiler # 2	Between 2:42 to 3:18 pm	N.J.A.C. 7:27-22.16(e)
59	12/16/2014	6-minute 10% Opacity	15%	150%	Boiler # 2	Between 2:42 to 3:18 pm	N.J.A.C. 7:27-22.16(e)
60	12/21/2014	6-minute 10% Opacity	14%	140%	Boiler # 3	Between 10:48 and 11:00 AM	N.J.A.C. 7:27-22.16(e)
61	**12/21/2014**	**6-minute 10% Opacity**	**26%**	**260%**	**Boiler # 3**	**Between 10:48 and 11:00 AM**	**N.J.A.C. 7:27-22.16(e)**
62	Fourth Quarter 2014	Continuously Monitor ESP Inlet Temperature	25 hours downtime	n/a	Unit # 1		40 CFR 62.14109(b)
63	Fourth Quarter 2014	Continuously Monitor Steam Flow Rate	25 hours downtimes	n/a	Boiler # 1		N.J.A.C. 7:27-22.16(e)
64	1/8/2015	1-hr. CO (400 ppmvd)	606 ppm	152%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
65	1/8/2015	4-hr. CO (100 ppmvd)	186 ppm	186%	Boiler # 1		40 CFR 62.14104(a)
66	1/8/2015	5-min. O2 (3% min.)	1.7%	57%	Boiler # 1		N.J.A.C. 7:27-22.16(e)

67	1/26/2015	6-minute 10% Opacity	16%	160%	Boiler # 2	Between 6:42 and 7:30 PM "Tinted Plume"	N.J.A.C. 7:27-22.16(e)
68	**1/26/2015**	**6-minute 10% Opacity**	**25%**	**250%**	**Boiler #2**	**"Tinted Plume"**	**N.J.A.C. 7:27-22.16(e)**
69	1/26/2015	6-minute 10% Opacity	18%	180%	Boiler #2	"Tinted Plume"	N.J.A.C. 7:27-22.16(e)
70	1/26/2015	6-minute 10% Opacity	11%	110%	Boiler #2	"Tinted Plume"	N.J.A.C. 7:27-22.16(e)
71	1/26/2015	6-minute 10% Opacity	17%	170%	Boiler #2	"Tinted Plume"	N.J.A.C. 7:27-22.16(e)
72	1/26/2015	6-minute 10% Opacity	16%	160%	Boiler #2	"Tinted Plume"	N.J.A.C. 7:27-22.16(e)
73	**1/26/2015**	**6-minute 10% Opacity**	**30%**	**300%**	**Boiler # 1**	**"Tinted Plume"**	**N.J.A.C. 7:27-22.16(e)**
74	**1/26/2015**	**6-minute 10% Opacity**	**29%**	**290%**	**Boiler #1**	**"Tinted Plume"**	**N.J.A.C. 7:27-22.16(e)**
75	1/26/2015	6-minute 10% Opacity	14%	140%	Boiler #1	"Tinted Plume"	N.J.A.C. 7:27-22.16(e)
76	1/31/2015	6-minute 10% Opacity	16 %	160%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
77	1/31/2015	6-minute 10% Opacity	12%	120%	Boiler #1		N.J.A.C. 7:27-22.16(e)
78	2/3/2015	6-minute 10% Opacity	12%	120%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
79	2/10/2015	6-minute 10% Opacity	18%	180%	Boiler #3		N.J.A.C. 7:27-22.16(e)
80	2/10/2015	6-minute 10% Opacity	13%	130%	Boiler #3		N.J.A.C. 7:27-22.16(e)
81	**2/14/2015**	**6-minute 10% Opacity**	**33%**	**330%**	**Boiler #3**		**N.J.A.C. 7:27-22.16(e)**
82	**2/14/2015**	**6-minute 10% Opacity**	**27%**	**270%**	**Boiler #3**		**N.J.A.C. 7:27-22.16(e)**
83	**2/14/2015**	**6-minute 10% Opacity**	**29%**	**290%**	**Boiler #3**		**N.J.A.C. 7:27-22.16(e)**
84	2/14/2015	6-minute 10% Opacity	11%	110%	Boiler #3		N.J.A.C. 7:27-22.16(e)
85	2/14/2015	6-minute 10% Opacity	12%	120%	Boiler #3		N.J.A.C. 7:27-22.16(e)
86	2/14/2015	6-minute 10% Opacity	11%	110%	Boiler #3		N.J.A.C. 7:27-22.16(e)
87	2/14/2015	6-minute 10% Opacity	16%	160%	Boiler #3		N.J.A.C. 7:27-22.16(e)
88	2/14/2015	6-minute 10% Opacity	11%	110%	Boiler #3		N.J.A.C. 7:27-22.16(e)
89	**2/21/2015**	**6-minute 10% Opacity**	**11 – 33%**	**110 – 330%**	**Boiler #3**		**N.J.A.C. 7:27-22.16(e)**
90	2/21/2015	6-minute 10% Opacity	12%	120%	Boiler #2		N.J.A.C. 7:27-22.16(e)
91	**2/21/2015**	**1-hr. CO (400 ppmvd)**	**1124 ppm**	**281%**	**Boiler #2**		**N.J.A.C. 7:27-22.16(e)**
92	**2/21/2015**	**4-hr. CO (100 ppmvd)**	**292 ppm**	**292%**	**Boiler #2**		**40 CFR 62.14104(a)**
93	**2/21/2015**	**1-hr. CO (400 ppmvd)**	**1347 ppm**	**337%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
94	**2/21/2015**	**4-hr. CO (100 ppmvd)**	**357 ppm**	**357%**	**Boiler # 3**		**n/a**
95	**2/22/2015**	**1-hr. CO (400 ppmvd)**	**7696 ppm**	**1,924%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**

96	2/22/2015	4-hr. CO (100 ppmvd)		n/a	Boiler # 2		40 CFR 62.14104(a)
97	**2/22/2015**	**1-hr. CO (400 ppmvd)**	**7471 ppm**	**1,868%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
98	**2/22/2015**	**6-minute 10% Opacity**	**11 – 33%**	**110 – 330%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
99	2/22/2015	1-hr. NOx (300 ppmvd)	400 ppm	133%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
100	2/22/2015	4-day CO (100 ppmvd)	146 ppm	146%	Boiler # 2	Between 1:00 AM 2/22/2015 and 4:00 PM 2/25/2015	N.J.A.C. 7:27-22.16(e)
101	2/22/2015	1-hr. NOx (300 ppmvd)	329 ppm	110%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
102	2/22/2015	4-day CO (100 ppmvd)	171 ppm	171%	Boiler # 3	Between 1:00 AM and 9:00 PM	N.J.A.C. 7:27-22.16(e)
103	2/22/2015	1-hr. SO2 (94 ppmvd)	139 ppm	148%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
104	2/22/2015	1-hr. SO2 (94 ppmvd)	114 ppm	121%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
105	**2/28/2015**	**6-minute 10% Opacity**	**11 – 39%**	**110 – 390%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
106	**4/3/2015**	**6-minute 10% Opacity**	**11 – 39%**	**110 – 390%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
107	**4/3/2015**	**1-hr. CO (400 ppmvd)**	**2750 ppm**	**688%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
108	4/25/2015	1-hr. SO2 (94 ppmvd)	97 ppmvd	103%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
109	5/9/2015	1-hr. SO2 (94 ppmvd)	103 ppm	110%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
110	6/21/2015	6-minute 10% Opacity	15%	150%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
111	**6/24/2015**	**6-minute 10% Opacity**	**29%**	**290%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
112	**6/24/2015**	**6-minute 10% Opacity**	**26%**	**260%**	**Boiler #2**		**N.J.A.C. 7:27-22.16(e)**
113	6/24/2015	6-minute 10% Opacity	17%	170%	Boiler #2		N.J.A.C. 7:27-22.16(e)
114	7/30/2015	6-minute 10% Opacity	12%	120%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
115	7/30/2015	6-minute 10% Opacity	19%	190%	Boiler #1		N.J.A.C. 7:27-22.16(e)
116	7/30/2015	6-minute 10% Opacity	11%	110%	Boiler #1		N.J.A.C. 7:27-22.16(e)
117	**8/10/2015**	**6-minute 10% Opacity**	**32%**	**320%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
118	8/17/2015	1-hr. CO (400 ppmvd)	683 ppm	170%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
119	8/17/2015	4-hr. CO (100 ppmvd)	215 ppm	215%	Boiler # 3		40 CFR 62.14104(a)
120	8/17/2015	5-min. 02 (3% min.)	2.10%	70%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
121	8/30/2015	4-hr. CO (100 ppmvd)	101 ppm	101%	Boiler # 1		40 CFR 62.14104(a)
122	9/2/2015	6-minute 10% Opacity	14%	140%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
123	9/2/2015	6-minute 10% Opacity	14%	140%	Boiler # 1		N.J.A.C. 7:27-22.16(e)

124	10/4/2015	6-minute 10% Opacity	12%	120%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
125	**10/6/2015**	**6-minute 10% Opacity**	**20%**	**200%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
126	10/6/2015	6-minute 10% Opacity	17%	170%	Boiler #2		N.J.A.C. 7:27-22.16(e)
127	10/6/2015	6-minute 10% Opacity	12%	120%	Boiler #2		N.J.A.C. 7:27-22.16(e)
128	10/6/2015	6-minute 10% Opacity	11%	110%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
129	10/6/2015	6-minute 10% Opacity	17%	170%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
130	**10/6/2015**	**6-minute 10% Opacity**	**25%**	**250%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
131	**10/6/2015**	**6-minute 10% Opacity**	**28%**	**280%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
132	**10/6/2015**	**6-minute 10% Opacity**	**21%**	**210 %**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
133	10/6/2015	6-minute 10% Opacity	11%	110 %	Boiler # 3		N.J.A.C. 7:27-22.16(e)
134	10/12/2015	6-minute 10% Opacity	13%	130%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
135	10/12/2015	6-minute 10% Opacity	14%	140%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
136	**10/12/2015**	**6-minute 10% Opacity**	**27%**	**270%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
137	**10/12/2015**	**6-minute 10% Opacity**	**28%**	**280%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
138	**10/12/2015**	**6-minute 10% Opacity**	**26%**	**260%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
139	**10/12/2015**	**6-minute 10% Opacity**	**20%**	**200%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
140	10/12/2015	6-minute 10% Opacity	12%	120%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
141	**10/14/2015**	**6-minute 10% Opacity**	**25%**	**250%**	**Boiler # 3**		**N.J.A.C. 7:27-22.16(e)**
142	**10/14/2015**	**6-minute 10% Opacity**	**29%**	**290%**	**Boiler #3**		**N.J.A.C. 7:27-22.16(e)**
143	10/14/2015	6-minute 10% Opacity	17%	170%	Boiler #3		N.J.A.C. 7:27-22.16(e)
144	**10/23/2015**	**6-minute 10% Opacity**	**12 – 22%**	**120 – 220%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
145	10/23/2015	6-minute 10% Opacity	11%	110%	Boiler #2		N.J.A.C. 7:27-22.16(e)
146	**11/10/2015**	**6-minute 10% Opacity**	**22%**	**220%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
147	11/10/2015	6-minute 10% Opacity	19%	190%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
148	11/10/2015	6-minute 10% Opacity	12%	120%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
149	11/15/2015	6-minute 10% Opacity	11%	110%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
150	11/18/2015	6-minute 10% Opacity	11%	110%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
151	11/18/2015	1-hr. CO (400 ppmvd)	541 ppmvd	135%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
152	11/18/2015	5-min. O2 (3% min.)	0.6%	20%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
153	12/20/2015	6-minute 10% Opacity	11%	110%	Boiler # 1		N.J.A.C. 7:27-22.16(e)

154	1/13/2016	6-minute 10% Opacity	13%	130%	Boiler # 1	Tinted plume associated with iodine	N.J.A.C. 7:27-22.16(e)
155	1/13/2016	6-minute 10% Opacity	13%	130%	Boiler # 1	Tinted plume associated with iodine	
156	1/13/2016	6-minute 10% Opacity	15%	150%	Boiler # 1	Tinted plume associated with iodine	
157	1/13/2016	6-minute 10% Opacity	19%	190%	Boiler # 1	Tinted plume associated with iodine	
158	**1/13/2016**	**6-minute 10% Opacity**	**22%**	**220%**	**Boiler # 1**	**Tinted plume associated with iodine**	
159	**1/13/2016**	**6-minute 10% Opacity**	**25%**	**250%**	**Boiler # 1**	**Tinted plume associated with iodine**	
160	1/13/2016	6-minute 10% Opacity	12%	120%	Boiler # 1	Tinted plume associated with iodine	
161	1/20/2016	6-minute 10% Opacity	15%	150%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
162	2/13/2016	6-minute 10% Opacity	17%	170%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
163	2/17/2016	6-minute 10% Opacity	15%	150%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
164	2/21/2016	6-minute 10% Opacity	17%	170%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
165	2/22/2016	6-minute 10% Opacity	11%	110%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
166	2/22/2016	6-minute 10% Opacity	11%	110%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
167	2/22/2016	6-minute 10% Opacity	18%	180%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
168	2/28/2016	6-minute 10% Opacity	18%	180%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
169	2/28/2016	6-minute 10% Opacity	15%	150%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
170	2/28/2016	6-minute 10% Opacity	16%	160%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
171	**3/3/2016**	**6-minute 10% Opacity**	**39%**	**390%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
172	**3/3/2016**	**6-minute 10% Opacity**	**21%**	**210%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
173	**3/3/2016**	**6-minute 10% Opacity**	**21%**	**210%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
174	3/3/2016	6-minute 10% Opacity	11%	110%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
175	4/10/2016	6-minute 10% Opacity	11%	110%	Boiler # 2	Between 2:18 and 2:54 PM	N.J.A.C. 7:27-22.16(e)
176	4/10/2016	6-minute 10% Opacity	11%	110%	Boiler # 2	Between 2:18 and 2:54 PM	N.J.A.C. 7:27-22.16(e)
177	4/10/2016	6-minute 10% Opacity	12%	120%	Boiler # 2	Between 2:18 and 2:54 PM	N.J.A.C. 7:27-22.16(e)
178	4/10/2016	6-minute 10% Opacity	13%	130%	Boiler # 2	Between 2:18 and 2:54 PM	N.J.A.C. 7:27-22.16(e)

179	4/10/2016	6-minute 10% Opacity	12%	120%	Boiler # 2	Between 2:18 and 2:54 PM	N.J.A.C. 7:27-22.16(e)
180	4/10/2016	6-minute 10% Opacity	12%	120%	Boiler # 2	Between 2:18 and 2:54 PM	N.J.A.C. 7:27-22.16(e)
181	4/10/2016	6-minute 10% Opacity	13%	130%	Boiler # 2	Between 2:18 and 2:54 PM	N.J.A.C. 7:27-22.16(e)
182	**4/21/2016**	**6-minute 10% Opacity**	**20%**	**200%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
183	4/21/2016	1-hr. CO (400 ppm)	Violation (emission not listed)	n/a	Boiler # 2		N.J.A.C. 7:27-22.16(e)
184	4/21/2016	4-hr. CO (100 ppm)	Violation (emission not listed)	n/a	Boiler # 2		N.J.A.C. 7:27-22.16(e)
185	4/24/2016	6-minute 10% Opacity	12%	120%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
186	5/6/2016	1-hr. CO (400 ppm)	498 ppm	125%	Boiler # 2	Between 1:00 and 2:00 AM	40 CFR 62.14109(a)
187	5/6/2016	4-hr. CO (100 ppm)	134	134%	Boiler # 2	Between 12:00 AM and 4:00 AM.	N.J.A.C. 7:27-22.3 (e)
188	5/23/2016	6-Minute 10% Opacity	15%	150%	Boiler # 3	Tinted plume associated with iodine – Between 5:54 and 6:12 PM	N.J.A.C. 7:27-22.16(e)
189	5/23/2016	6-Minute 10% Opacity	18%	180%	Boiler # 3	Tinted plume associated with iodine – Between 5:54 and 6:12 PM	N.J.A.C. 7:27-22.16(e)
190	**5/23/2016**	**6-Minute 10% Opacity**	**20%**	**200%**	**Boiler # 3**	**Tinted plume associated with iodine – Between 5:54 and 6:12 PM**	**N.J.A.C. 7:27-22.16(e)**
191	**5/23/2016**	**6-Minute 10% Opacity**	**24%**	**240%**	**Boiler # 3**	**Tinted plume associated with iodine – Between 5:54 and 6:12 PM**	**N.J.A.C. 7:27-22.16(e)**
192	Third Quarter 2016	Continuously Monitor Steam Flow Rate	Failed to continuously monitor.	n/a	Boiler # 1		N.J.A.C. 7:27-22.16(e)
193	Third Quarter 2016	Continuously Monitor Temperature	Failed to continuously monitor.	n/a	Boiler # 1 (ESP Unit)		40 CFR 62.14109(b)
194	**6/8/2016**	**6-minute 10% Opacity**	**23%**	**230%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
195	6/9/2016	6-minute 10% Opacity	12%	120%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
196	7/1/2016	4-hr. CO (100 ppm)	Violation (emission not listed)	n/a	Boiler # 1		N.J.A.C. 7:27-22.16(e)
197	7/1/2016	1-hr. CO (400ppm)	Violation (emission not listed)	n/a	Boiler # 1		N.J.A.C. 7:27-22.16(e)
198	7/1/2016	5-min. O2 (3% min.)	2.1%	71%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
199	7/14/2016	1-hr. CO (400 ppm)	Violation (emission not listed)	n/a	Boiler # 2		N.J.A.C. 7:27-22.16(e)
200	7/14/2016	5-min. O2 (3% min.)	1.8%	60%	Boiler # 2		N.J.A.C. 7:27-22.16(e)
201	7/18/2016	6-minute 10% Opacity	11 – 19%	110 – 190%	Boiler # 2		N.J.A.C. 7:27-22.16(e)

202	7/25/2016	4-hr. CO (100 ppm)	Violation (emission not listed)	n/a	Boiler # 3		40 CFR 62.14104(a)
203	7/25/2016	5-min. O2 (3% min.)	2.7%	90%	Boiler # 3		N.J.A.C. 7:27-22.16(e)
204	**8/2/2016**	**6-minute 10% Opacity**	**12 – 20%**	**120 – 200%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
205	**8/3/2016**	**6-minute 10% Opacity**	**12 – 20%**	**120 – 200%**	**Boiler # 2**		**N.J.A.C. 7:27-22.16(e)**
206	**9/2/2016**	**6-minute 10% Opacity**	**12 – 81%**	**120 – 810%**	**Boiler # 1**		**N.J.A.C. 7:27-22.16(e)**
207	10/10/2016	6-minute 10% Opacity	12%	120%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
208	10/19/2016	6-minute 10% Opacity	12%	120%	Boiler # 1		N.J.A.C. 7:27-22.16(e)
209	12/23/2016	6-minute 10% Opacity	11 – 13%	110 – 130%	Boiler # 2	Between 5:12 and 5:30 PM (4 consecutive opacity exceedances)	N.J.A.C. 7:27-22.16(e)
210	12/23/2016	6-minute 10% Opacity	11 – 13%	110 – 130%	Boiler # 2	Between 5:12 and 5:30 PM (4 consecutive opacity exceedances)	N.J.A.C. 7:27-22.16(e)
211	12/23/2016	6-minute 10% Opacity	11 – 13%	110 – 130%	Boiler # 2	Between 5:12 and 5:30 PM (4 consecutive opacity exceedances)	N.J.A.C. 7:27-22.16(e)
212	12/23/2016	6-minute 10% Opacity	11 – 13%	110 – 130%	Boiler # 2	Between 5:12 and 5:30 PM (4 consecutive opacity exceedances)	N.J.A.C. 7:27-22.16(e)
213	**12/23/2016 Boiler # 3**	**6-minute 10% Opacity**	**13 – 47%**	**130 – 470%**	**Boiler # 3**	**Between 4:48 and 5:12 PM (4 consecutive opacity exceedances)**	**N.J.A.C. 7:27-22.16(e)**
214	**12/23/2016 Boiler # 3**	**6-minute 10% Opacity**	**13 – 47%**	**130 – 470%**	**Boiler # 3**	**Between 4:48 and 5:12 PM (4 consecutive opacity exceedances)**	**N.J.A.C. 7:27-22.16(e)**
215	**12/23/2016 Boiler # 3**	**6-minute 10% Opacity**	**13 – 47%**	**130 – 470%**	**Boiler # 3**	**Between 4:48 and 5:12 PM (4 consecutive opacity exceedances)**	**N.J.A.C. 7:27-22.16(e)**
216	**12/23/2016**	**6-minute 10% Opacity**	**13 – 47%**	**130 – 470%**	**Boiler # 3**	**Between 4:48 and 5:12 PM (4 consecutive opacity exceedances)**	**N.J.A.C. 7:27-22.16(e)**
217	Fourth Quarter 2016	Continuous Emission Monitoring (CEM)	12.5% Downtime	n/a	SO2 Outlet (Stack)		40 CFR 60.13(e)(2)
218	Calendar Year 2016	CEM O2 Outlet	94.88%	99.9%	Boiler # 1		40 CFR 62.14109(a)

		Monitors (95%)					
219	Calendar Year 2016	CEM O2 Outlet Monitors (95%)	94.88%	99.9%	Boiler # 3		40 CFR 62.14109(a)
220	Calendar Year 2016	CEM O2 Outlet Monitors (95%)	90.65%	95.4%	Boiler # 2		40 CFR 62.14109(a)
221	1/4/2017	6-minute 10% Opacity	11-14%	110 – 140%	Boiler #2	Between 2:24 and 2:36 PM (Purple Plume)	N.J.A.C. 7:27-22.16(e)
222	1/4/2017	6-minute 10% Opacity	11-14%	110 – 140%	Boiler #2	Between 2:24 and 2:36 PM (Purple Plume)	N.J.A.C. 7:27-22.16(e)
223	1/4/2017	6-minute 10% Opacity	11-14%	110 – 140%	Boiler #2	Between 2:24 and 2:36 PM (Purple Plume)	N.J.A.C. 7:27-22.16(e)
224	3/30/2017	6-minute 10% Opacity	14%	140%	Boiler #3	(Purple Plume)	N.J.A.C. 7:27-22.16(e)
225	4/25/2017	4-hr. CO (100 ppmvd)	Violation (emission not listed)	n/a	Boiler #1	Between 4:00 and 8:00 PM	40 CFR 62.14104(a)
226	4/25/2017	6-minute 10% Opacity	11-12%	110 – 120%	Boiler #1	Between 5:42 and 7:18 PM	N.J.A.C. 7:27-22.16(e)
227	4/25/2017	6-minute 10% Opacity	11-12%	110 – 120%	Boiler #1	Between 5:42 and 7:18 PM	N.J.A.C. 7:27-22.16(e)
228	4/25/2017	6-minute 10% Opacity	11-12%	110 – 120%	Boiler #1	Between 5:42 and 7:18 PM	N.J.A.C. 7:27-22.16(e)
229	4/25/2017	6-minute 10% Opacity	11-12%	110 – 120%	Boiler #1	Between 5:42 and 7:18 PM	N.J.A.C. 7:27-22.16(e)
230	**7/5/2017**	**4-hr. CO (100 ppmvd)**	**454 ppm**	**454%**	**Boiler #1**	**Between 12:00 and 4:00 AM**	**40CFR 62.14104(a)**
231	**7/5/2017**	**1-hr. CO (400ppm)**	**871 ppm**	**218%**	**Boiler #1**	**Between 2:00 and 3:00 AM**	**N.J.A.C. 7:27-22.16(e)**
232	**7/5/2017**	**1-hr. CO (400ppm)**	**856 ppm**	**214%**	**Boiler #1**	**Between 3:00 and 4:00 AM**	**N.J.A.C. 7:27-22.16(e)**
233	7/5/2017	5-minute 3% O2	2.7%	90%	Boiler #1	Between 2:45 and 3:20 AM	N.J.A.C. 7:27-22.16(e)
234	7/5/2017	5-min. O2 (3% min.)	1.4%	47%	Boiler #1	Between 2:45 and 3:20 AM	N.J.A.C. 7:27-22.16(e)
235	7/5/2017	5-min. O2 (3% min.)	2.8%	93%	Boiler #1	Between 2:45 and 3:20 AM	N.J.A.C. 7:27-22.16(e)
236	7/5/2017	5-min. O2 (3% min.)	2.4%	80%	Boiler #1	Between 2:45 and 3:20 AM	N.J.A.C. 7:27-22.16(e)
237	7/5/2017	5-min. O2 (3% min.)	1.9%	63%	Boiler #1	Between 2:45 and 3:20 AM	N.J.A.C. 7:27-22.16(e)
238	7/5/2017	5-min. O2 (3% min.)	1.8%	60%	Boiler #1	Between 2:45 and 3:20 AM	N.J.A.C. 7:27-22.16(e)
239	7/5/2017	5-min. O2 (3% min.)	1.4-2.8%	47 - 93%	Boiler #1	Between 2:45 and 3:20 AM	N.J.A.C. 7:27-22.16(e)
240	9/6/2017	6-minute 10% Opacity	11%	110%	Boiler #1	Between 6:12 and 6:18 PM	N.J.A.C. 7:27-22.16(e)
241	9/20/2017	6-minute 10% Opacity	13%	130%	Boiler #2	Between 7:42 and 8:00 PM	N.J.A.C. 7:27-22.16(e)
242	9/20/2017	6-minute 10% Opacity	19%	190%	Boiler #2	Between 7:42 and 8:00 PM	N.J.A.C. 7:27-22.16(e)
243	**9/20/2017**	**6-minute 10% Opacity**	**20%**	**200%**	**Boiler #2**	**Between 7:42 and 8:00 PM**	**N.J.A.C. 7:27-22.16(e)**

244	9/21/2017	1-hr SO2 (94 ppmvd)	130 ppm	138%	Boiler #3	Between 6:00 and 7:00 PM	N.J.A.C. 7:27-22.3(e)
245	9/22/2017	1-hr SO2 (94 ppmvd)	101 ppm	107%	Boiler #3	Between 7:00 and 8:00 PM	N.J.A.C. 7:27-22.16(e)
246	9/28/2017	1-hr. CO (400ppm)	623 ppm	156%	Boiler #1	Between 5:00 and 6:00 PM	N.J.A.C. 7:27-22.16(e)
247	9/28/2017	5-min. O2 (3% min.)	2.8%	93%	Boiler #1	Between 5:00 and 5:15 PM	N.J.A.C. 7:27-22.16(e)
248	9/28/2017	5-min. O2 (3% min.)	2.0%	67%	Boiler #1	Between 5:00 and 5:15 PM	N.J.A.C. 7:27-22.16(e)
249	9/28/2017	5-min. O2 (3% min.)	2.2%	73%	Boiler #1	Between 5:00 and 5:15 PM	N.J.A.C. 7:27-22.16(e)
250	10/20/2017	5-yr stack Test for SO2, NOx, Sulfuric Acid Mists, VOC, Ammonia, Heavy Metal Compounds.	Failed to conduct required 5-year Stack Test within a year of expiration of Title V Operating Permit. Didn't conduct Stack Test until 5/14/2018.	n/a	Stacks	Stack Test was due on October 20, 2017. Title V Operating Permit expired on October 20, 2018. Stack Tests were not complete until May 14, 2018	N.J.A.C. 7:27-22.18(h)
251	10/20/2017	5-yr stack Test for CO Emissions and HF Emission.	Failed to conduct required 5-year Stack Test within a year of expiration of Title V Operating Permit. Didn't conduct Stack Test until the week 5/14/2018.	n/a	Stacks	Stack Test was due on October 20, 2017. Title V Operating Permit expired on October 20, 2018. Stack Tests were not complete until the week of May 14, 2018	N.J.A.C. 7:27-22.18(h)
252	10/23/2017	4-hr. CO (100 ppmvd)	139 ppm	139%	Boiler #1	Between 12:00 and 4:00 PM	40 CFR 62.14104(a)
253	11/3/2017	Pressure drop range 1-6 in. w.c.	0.2 in. w.c.	20%	Baghouse filter control device (CD1022) Emission Unit U15		N.J.A.C. 7:27-22.16(a)
254	12/2/2017	Pressure drop range 1-6 in. w.c.	0.3 in. w.c.	30%	Baghouse filter control device (CD1022) Emission Unit U15		N.J.A.C. 7:27-22.16(a)
255	12/24/2017	Pressure drop range 1-6 in. w.c.	0.6 in. w.c.	60%	Baghouse filter control device (CD1022) Emission Unit U15		N.J.A.C. 7:27-22.16(a)
256	1/5/2018	4-hr. CO (100 ppmvd)	138 ppm	138%	Boiler #3	Between 12:00 and 4:00 PM	40 CFR 62.14104(a)
257	1/13/2018	Pressure drop range 1-6 in. w.c.	7.7 in. w.c.	128%	Baghouse filter control device (CD1022) Emission Unit U15		N.J.A.C. 7:27-22.16(a)

258	**2/8/2018**	**Pressure drop range 1-6 in. w.c.**	**14.6 in. w.c.**	**243%**	**Baghouse filter control device (CD1022) Emission Unit U15**		**N.J.A.C. 7:27-22.16(a)**
259	3/2/2018	4-hr. CO (100 ppmvd)	101 ppm	101%	Boiler #3	Between 12:00 and 4:00 PM	40 CFR 62.14104(a)
260	5/20/2018	Dust collector CD 1019	CD 1019 was not in operation for several periods between 5/20/2018 and 12/10/2018 due to equipment failure.	n/a	Flyash conditioning room	Beginning with May 20, 2018 to December 10, 2018.	N.J.A.C. 7:27-22.16(e)
261	5/30/2018	6-minute 10% Opacity	11%	110%	Boiler #2	Between 4:30 and 4:42 PM	N.J.A.C. 7:27-22.16(e)
262	5/30/2018	6-minute 10% Opacity	11%	110%	Boiler #2	Between 4:30 and 4:42 PM	N.J.A.C. 7:27-22.16(e)
263	**7/4/2018**	**6-minute 10% Opacity**	**26%**	**260%**	**Boiler #1**		**N.J.A.C. 7:27-22.16(e)**
264	7/11/2018	4-hr. CO (100 ppmvd)	102 ppm	102%	Boiler #1	Between 12:00 and 4:00 PM	40 CFR 62.14104(a)
265	9/2/2018	6-minute 10% Opacity	11% Opacity	110%	Boiler #2	Between 3:36 and 3:42 AM	N.J.A.C. 7:27-22.16(e)
266	9/4/2018	6-minute 10% Opacity	14%	140%	Boiler #1	Tinted plume associated with iodine	N.J.A.C. 7:27-22.16(e)
267	**9/4/2018**	**6-minute 10% Opacity**	**23%**	**230%**	**Boiler #1**	**Tinted plume associated with iodine**	**N.J.A.C. 7:27-22.16(e)**
268	9/4/2018	6-minute 10% Opacity	17%	170%	Boiler #1	Tinted plume associated with iodine	N.J.A.C. 7:27-22.16(e)
269	9/4/2018	6-minute 10% Opacity	11%	110%	Boiler #1	Tinted plume associated with iodine	N.J.A.C. 7:27-22.16(e)
270	9/4/2018	6-minute 10% Opacity	11%	110%	Boiler #1	Tinted plume associated with iodine	N.J.A.C. 7:27-22.16(e)
271	10/6/2018	4-hr. CO (100 ppmvd)	104 ppm	104%	Boiler #3	Between 12:00 and 4:00 PM	40 CFR 62.14104(a)
272	11/23/2018	4-hr. CO (100 ppmvd)	103 ppm	103%	Boiler #3	Between 12:00 and 4:00 PM	40 CFR 62.14104(a)
273	12/6/2018	4-hr. CO (100 ppmvd)	106 ppm	106%	Boiler #3	Tinted plume associated with iodine - Between 12:00 and 4:00 PM	40 CFR 62.14104(a)
274	12/6/2018	6-minute 10% Opacity	18%	180%	Boiler #3	Tinted plume associated with iodine - Between 3:12 and 3:30 PM	N.J.A.C. 7:27-22.16(e)
275	12/6/2018	6-minute 10% Opacity	15%	150%	Boiler #3	Tinted plume associated with iodine - Between 3:12 and 3:30 PM	N.J.A.C. 7:27-22.16(e)
276	12/6/2018	6-minute 10% Opacity	13%	130%	Boiler #3	Between 3:12 and 3:30 PM	N.J.A.C. 7:27-22.16(e)

277	**1/14/2019**	**6-minute 10% Opacity**	**19-23%**	**190 – 230%**	**Boiler #3**	**Between 4:18 and 4:30 PM (purple plume)**	**N.J.A.C. 7:27-22.16(e)**
278	**1/14/2019**	**6-minute 10% Opacity**	**19-23%**	**190 – 230%**	**Boiler #3**	**Between 4:18 and 4:30 PM (purple plume)**	**N.J.A.C. 7:27-22.16(e)**
279	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
280	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
281	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
282	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
283	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
284	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
285	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
286	1/14/2019	6-minute 10% Opacity	11-16%	110 – 160%	Boiler #2	Between 4:18 and 6:06 PM (purple plume)	N.J.A.C. 7:27-22.16(e)
287	1/25/2019	4-hr. CO (100 ppmvd)	104ppm	104%	Boiler #3	Between 12:00 and 4:00 AM	40 CFR 62.14104
288	**1/28/2019**	**6-minute 10% Opacity**	**12-27%**	**120 – 270%**	**Boiler #3**	**Between 5:18 and 6:30 PM (purple plume)**	**N.J.A.C. 7:27-22.16(e)**
289	**1/28/2019**	**6-minute 10% Opacity**	**12-27%**	**120 – 270%**	**Boiler #3**	**Between 5:18 and 6:30 PM (purple plume)**	**N.J.A.C. 7:27-22.16(e)**