

ENVIRONMENTAL COMPLIANCE ASSISTANCE, LLC

123 HILLSIDE LANE, SAYLORSBURG, PA 18353 PHONE: (570) 619-7758 CELL: (570) 269-5265 E-MAIL: BCOBING@ENVCOMPLIANCE.COM

January 8, 2014

Mr. Thomas Wiggins
Township of Union Public Schools
2369 Morris Avenue
Union, NJ 07083

RE: Proposal to Document and Submit the Annual Combustion Adjustment Data
for the Connecticut Farms Elementary School

Dear Mr. Wiggins:

Environmental Compliance Assistance, LLC (ECA) is pleased to provide this proposal to the Township of Union Public Schools (TUPS) and Board of Education to comply with the NJDEP reporting requirements for Annual Combustion Adjustments (ACA). ECA will review and **summarize your ACA data in a suitable report** containing all of the data required by NJDEP regulations. NJDEP rules specify that the required ACA data be maintained in a readily accessible format for 5 years and be made available to an NJDEP or County Inspector upon request. A subset of the ACA data **will then be electronically submitted to the NJDEP-Online computer system** as required by NJDEP regulations. The ACA data must be submitted electronically to NJDEP within 45 days after the ACA is completed. The NJDEP ACA requirements apply to the two boilers rated at 6.3 MMBtu/hour each, currently permitted on an old Pre-Construction Permit (PCP960001 for Air Permit Facility ID#41190).

In addition to preparing the ACA report and electronic submittal, ECA also proposes to update the facility contact information on file with the NJDEP Air Quality Permitting Program (AQPP). Currently, AQPP's records only list A. Magliacano as the "General Contact." The District should have names on file for contact types of Air Permit Information Contact, Fee/Billing Contact, and Responsible Official. Usually, the Director of Maintenance / Supervisor of Buildings and Grounds is listed as the first two contacts while the Business Administrator / Board Secretary is listed as the Responsible Official. An **application for a Non-Technical Amendment** will be prepared for this school for signature by the Responsible Official for submittal to NJDEP. Currently, ECA has a contact at NJDEP who will update the contact information for free for public schools (the fee is normally \$120 per facility). Unfortunately, this person is retiring soon, so the District may incur some additional costs for this activity depending on when the contract is initiated.

Finally, ECA will prepare an **Air Permit Book** with copies of all of the above information, along with copies of the current air permits and applications and equipment inventories on file with NJDEP. ECA will prepare and submit an OPRA (Open Public Records Act) request to NJDEP for a copy of the original application (probably pink/green VEM003/VEM004 forms or possibly VEM045 forms) for PCP960001 to include in the Air Permit Book if the District cannot locate any copies on file. Finally, a copy of the current Certificate to Operate for the schools boilers (currently due to expire on January 18, 2016) will be included in the Air Permit Book (a laminated copy will also be prepared to post in the boiler room).

The expected cost for the proposed Scope-of-Work listed above is \$2420.00. This assumes that the ACA data to be provided by the HVAC contractor will include completed ACA forms (blank forms were included with the ACA memo that ECA recently provided), in addition to the paper-tape raw data printed by the combustion analyzer. **ECA will not and cannot perform the Annual Combustion Adjustment, which must be performed by a qualified boiler technician, typically your HVAC contractor.** It is expected that the HVAC contractor will perform the ACA in accordance with and satisfying all NJDEP regulatory requirements. Again, ECA provided you an ACA memo describing the NJDEP regulatory requirements. ECA will also need copies of the utility bills for the natural gas used at this location for the previous 12 months (if there is only one natural gas bill/meter for this location, then two utility bills spaced 12 months apart should suffice).

Drafts of all materials (ACA technical report, ACA electronic submittal, and NTA application) will be provided to you for your review and approval prior to final submittal. Again, for the Scope-of-Work proposed above, ECA estimates costs as \$2420. In order to minimize costs, there are no monies included

for any site visits to your school and all project activities will be conducted from ECA offices. It is expected that all necessary information will be provided by the HVAC contractor and TUPS in a timely fashion in order to complete the electronic submittal and ACA report. In addition to the ACA data listed above, TUPS must also designate the desired facility contacts – including names, titles, mailing addresses, and e-mail addresses – for the Non-Technical Amendment application. ECA project costs for this proposed scope of work are based on approximately three man-days of effort. Should a facility visit or visits be required, there will be additional charges billed separately from this proposal.

The proposed project expenses are based on and are limited by the assumptions described above. Estimated costs can be provided for any additional services requested. Costs would accrue on a time and materials basis according to the attached Schedule of Charges. In order to minimize your costs, I have reduced my hourly billing rate to \$105.00 per hour, the same as my rate for previous work activities for the other Districts.

Estimated costs **do not include** any permit application or registration fees, any fines/penalties, or any specialty analyses requested or required by the NJDEP other than those specified above, including but not limited to air dispersion modeling, State-Of-The-Art control analyses, or health risk assessments (none of this are likely or expected). The costs also do not include any application fees for Non-Technical Amendments (\$120/application), a distinct possibility as described above. The costs presented are estimated maximum costs and will not be exceeded without prior approval by the TUPS and the Board of Education. ECA will keep the TUPS and the Board of Education apprised of project activities in monthly invoices and will notify the TUPS in advance if any additional funding for any of activities are needed (highly unlikely).

William E. Corbin of ECA will be managing the project and its technical scope and personally performing the services discussed. Mr. Corbin has over 30 years of environmental consulting experience for a variety of environmental programs, particularly air permitting services, in a wide variety of industries.

ECA provides specialized consulting services focusing on:

- Environmental Permitting and Impact Statements
- Environmental Regulatory Submissions such as Emission Statements, Toxic Release Inventory (TRI) Form R Reports, Community Right-To-Know Filings, NJDEP Release and Pollution Prevention Reports (RPPRs), and Excess Emission and Monitor Performance Reports (EEMPRs)
- Environmental Auditing
- Regulatory/Compliance Strategies
- Solid and Hazardous Waste Consulting
- Emissions Banking/Offset Trading Services
- Air Quality Dispersion Modeling and Risk Assessments

ECA staff has extensive experience in air permitting in New Jersey including developing permitting strategies, preparing air permit applications utilizing NJDEP's RADIUS software and General Permit electronic registration systems, and coordinating agency negotiations. The RADIUS software program is utilized to prepare and electronically submit air permit applications (which are more complex than General Permit registrations) and emission statements.

Thank you for considering Environmental Compliance Assistance, LLC, for this project. Should you require any additional information, please feel free to contact me at (570) 269-5265.

Sincerely,
ENVIRONMENTAL COMPLIANCE ASSISTANCE, LLC



William E. Corbin
Principal

AUTHORIZATION TO PROCEED WITH
PROVIDING AIR PERMIT COMPLIANCE ACTIVITIES
FOR THE
TOWNSHIP OF UNION PUBLIC SCHOOLS AND BOARD OF EDUCATION

Name (Please Print)

Title

Signature

Date

Purchase Order Number (If applicable)

*****CONFIDENTIAL*****

ENVIRONMENTAL COMPLIANCE ASSISTANCE, LLC
STANDARD SCHEDULE OF CHARGES

<u>Title</u>	<u>Billing Rate</u>
Principal	\$150/hour
Associate	\$125/hour
Senior Scientist/Engineer	\$115/hour
Project Scientist/Engineer	\$95/hour
Scientist	\$80/hour
Technician	\$75/hour
Secretary/Draftsman	\$45/hour

Billing Rates above represent averages for the stated labor classes. Project Billings will be based on actual salary rates. Expenses and other direct costs are billed at a factor of 1.10 times cost. All invoices are payable upon receipt. Payment delayed past thirty days will be subject to an interest charge of 1.5% per month.

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