

**From:** BRIAN RAY  
**To:** DEP NJDEP-BAOP  
**Subject:** [EXTERNAL] Public Comments  
**Date:** Wednesday, March 11, 2020 12:59:09 PM

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My apologies for the late public comments by one day; please accept them.

Submitter:

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Comments:

The following are directive the DEP should take.

DEP must provide environmental justice communities specialized permitting procedures where as the right to emit for stationeries is only given to essential units such as EGUs but those EGUs will incur emission limits guided by the sustainable energy goals NJ has for year 2050; non essential stationary units or nonEGUs should be limited to emit far less than EGUs. There should be a threshold for which nonEGUs can emit, the essential EGUs should then be accorded their own emissions allowances strictly above that reserved for non essentials. Incentives should be developed for non essential and essential EGUs and nonEGUs to reduce emissions voluntarily.

Conceptual Example:

On a spectrum, non EGUs can only emit up to certain levels from X to Y for permitting, essential EGUs can emit from X to Z, with Y being the cut off for non essential or nonEGU stationary emission sources, but the range Y to Z being the limit for essential EGUs and their respective allowability.

Also, emissions permitting under this model or without should be cluster sensitive and should be limited in areas where multiple EGUs and nonEGUs are compounded. Basically put, emissions levels for areas should be lowered if there are multiple permitted facilities working in close proximity or are multiple emissions factors from non stationary sources.

Example: What good is it to have strict emissions permitting on one facility when multiple are in the same area producing an overall large emissions pool. There should be mandates to protect from this happening and to this point, prioritized in communities where industry and emissions sources across the board effect people most firstly.

This may be more towards the emissions reporting conversation but enforcement of reductions and research to circumvent coverup efforts at facilities like those we saw in the VW emissions scandal.

With respect to electronic/renewable energy boilers, EGUs, Heat producers: Training, education, and brokerage for incentives or discounts like equipment financing need to be offered to communities needing jobs firstly, such as communities where offenders returning

from the criminal justice system/needed applicants can qualify for certification programming, training for repairmen of older, more dated systems where industry will make great change, and consultation to upgrade older heavy fuel intensive buildings and sites. The implementation of these programs or assistance should be prioritized as a function for greater improvements in NJ across the regional PJM grid, cost efficiency, and EJ community needs.

Prioritization made to the grid in NJ to implement sustainable and renewable energy should be in favor of communities needing emissions reductions first. These changes should also be made to prepare the PJM wide renewable energy load and needs forecasted for the future in relation to the EMP.

The DEP must live up to its newly ordered promises of ensuring climate protection by delaying and eliminating the unnecessary creation of the ~13 fossil fuel power facilities looking to be created in NJ; this directly infringes on any effort to reach reductions goals in NJ under the EMP and dates recommended to have had a reduction in emissions specified under the document for year 2050 and before.

The DEP must effectively reduce emissions under the RGGI and TCI program; these programs are not equipped so far to produce any emissions reductions and they simply allow polluters to continue on, even higher in some situations, within communities already burdened by high emissions.