



Powering Today. Protecting Tomorrow.

Covanta Essex Company
183 Raymond Boulevard
Newark, NJ 07105
Tel: 973-344-0900
Fax: 973-344-4999

May 2, 2022

Mr. Jeffrey Meyer, Manager
Division of Air Enforcement
Bureau of Air Compliance & Enforcement - Northern
7 Ridgedale Avenue
Cedar Knolls, NJ 07927

Subject: Essex County Resource Recovery Facility
Program Interest (Title V) Number 07736
NEA200001-07736 – Administrative Consent Order
Progress Report #10

Dear Mr. Meyer:

On behalf of Covanta Essex Company and in accordance with the Item #17 under the above referenced Administrative Consent Order (ACO) NEA200001-07736, attached is Progress Report #10 explaining the status of Covanta Essex Company's compliance with the Compliance Schedule required by the ACO.

If you have any questions or need additional information please contact Patricia Earls of my staff at 973-817-7322 or pearls@covanta.com.

Sincerely,

Patricia Earls
New Jersey Regional Environmental Manager

Attachments

Mr. Jeffrey Meyer

Page 2

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this letter and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate, or incomplete information."



David Blackmore

Facility Manager

5/2/22

Date

Covanta Essex Company, PI #07736
Progress Report #10
NEA200001-07736 – Administrative Consent Order, Item #17

A. Identification of Site and Reference to ACO

Covanta Essex Company, PI #07736
Administrative Consent Order (ACO) NEA200001-07736

B. Status of Permitting and Planning Approvals, and any work at the site and progress to date

Status of Permitting and Planning Approvals:

Other than the Title V Operating Permit Renewal (BOP170001) and the Solid Waste Operating Permit Renewal (RRF200001), there are currently no other permitting or planning approvals currently pending or in progress related to the requirements of the ACO.

Work at the site and progress since submittal of Progress Report #9 on March 1, 2022:

- Implementation of the Communications and Community Engagement Plan is ongoing. The facility mailed out the first bi-annual Community Newsletter on April 12, 2022. The newsletter was printed in English, Spanish and Portuguese and includes updates relating to facility operations, job opportunities, community activities and answers to frequently asked questions. A copy of the newsletter is included as an attachment to this report.
- On August 17, 2021, Covanta Essex Company also posted a Hotline number on the Covanta Essex website. The Hotline is available 24 hours per day, seven days per week and allows the public to contact the facility to obtain the latest information on plant-specific incidents or announcements. Callers can leave a message with the Hotline operator which will be immediately emailed to plant management along with the caller's contact information so that a timely response can be provided. The Hotline has the capability to speak to residents in English, Spanish, and Portuguese. To date, there have been no calls received from the public to the Hotline.
- The next Open Meeting is currently being planned and is tentatively scheduled to take place at the Blue Print Café in Newark to be held in June, 2022. This will be an in-person event and will allow members of the public and other invited guests from local environmental groups to learn more about the facility and get answers to any questions they might have.
- A technical notice of deficiency (NOD) on the Solid Waste Operating Permit Renewal (RRF200001) application was received from the NJDEP Solid Waste Permitting division in a letter dated November 10, 2021. The NOD requested that Covanta Essex Company make changes to the facility O&M manual to incorporate the purple plume prevention procedures from reports submitted pursuant to the ACO requirements. These changes were completed and submitted to NJDEP on January 10, 2022. As part of these changes, a new section was

added to the Administrative Plans and Index section of the O&M manual identified as section API-3A, Purple Plume Mitigation Plan. This section includes protocols and procedures to prevent the delivery of iodinated waste to Covanta Essex and procedures and training at Covanta Essex to prevent processing of any iodinated waste delivered to Covanta Essex and deposited in the tipping floor area. A second technical NOD was received from the NJDEP Solid Waste Permitting division on April 7, 2022 with additional comments on the response submitted on January 10, 2022. As part of the response to the second NOD that will be submitted by May 6, 2022, some additional revisions are being made to the Purple Plume Mitigation Plan to include information on the Covanta Type 27 waste approval process and how waste containing iodine in any concentration would not be acceptable for destruction at the Covanta Essex facility.

C. Difficulties or problems encountered during the reporting period, and actions taken to rectify any difficulties or problems

There have been no difficulties or problems encountered during this reporting period.

D. Activities planned for the next reporting period

Activities planned for the next reporting period are as follows:

- Covanta is planning the next in-person Open Meeting that is tentatively scheduled to occur at the Blue Print Café in Newark in June 2022.

E. The required and actual completion dates for each item required by this ACO

See the updated table, included as Attachment 2 to this report, that lists action items required by the ACO along with required due dates and actual completion dates where applicable.

F. An explanation of any non-compliance with the compliance schedule

There are no instances of non-compliance with the schedule.

G. Evaluation of all corrective measures implemented to date

Covanta Essex Company continues to implement our Community Outreach effort and enhanced tipping floor inspection procedures in order to prevent iodinated waste from being combusted in the boilers. The successful identification of the source of the iodinated waste believed to have caused the purple plume events in 2019 and 2020, and subsequent permanent re-direction of that waste to another non-Covanta disposal facility, has resulted in no further purple plume opacity events at Covanta Essex Company since April 7, 2020.

The annual Open Meeting that was held virtually on December 16, 2021 from 5:00 to 6:00 pm via a Zoom webinar conducted by Covanta for the Essex facility was a successful event based on the levels

of attendance and participation by members of the public as well as the positive feedback received during the meeting. Another in-person Open Meeting will be held by Covanta Essex Company at a local café (Blue Print Café) and will be scheduled for June of 2022.

Going forward, Covanta Essex Company will host two Open Meetings per year. Each December, the Open Meeting will be held virtually to avoid weather issues and allow for a greater level of attendance as observed during the December 2020 and December 2021 meetings. Each June, the Open Meeting will be an in-person event held either at the facility or at the Blue Print Café on Raymond Boulevard in Newark which is within one mile of the facility.

As part of a greater transparency with the local community, Covanta Essex Company has implemented an additional notification procedure whereby the Ironbound Community Corporation (ICC) is contacted by phone and email of any emission exceedance events at the facility. Ms. Maria Lopez-Nunez, who is the Deputy Director, Organizing and Advocacy for the ICC, is notified of each event. Efforts have been made to get other organizations and local residents to sign up for our mailing list on our webpage in order to receive notifications of facility events, but no sign ups have been received to date from these groups. We will continue these efforts during the Open Meetings and will continue to include information on how to sign up in all future public correspondence from Covanta.

In 2018, Covanta Essex installed 10 HD digital cameras on the tipping floor. These originally included 2 cameras with additional pan, tilt and zoom (PTZ) capability. In 2019, after the increase in purple plume events, two of 10 HD digital cameras in the overhead location in front of Bays 2 and 13 were replaced with the PTZ cameras for a total PTZ capability for 4 of 10 cameras. This PTZ capability allows for greater visual observation of loads. All recorded video footage by the cameras is stored and available for review for up to 40 days.

Attachment 1

Welcome!

Welcome to the first edition of the Covanta Essex Bi-Annual Newsletter! Read about updates relating to Covanta Essex facility operations, job opportunities, local community activities and answers to frequently asked questions. Please visit our website at www.covanta.com/essex to sign up for our newsletter electronically and to find out more about our facility.

¡Bienvenido!

¡Bienvenido a la primera edición del Boletín Bianual de Covanta Essex! Lee acerca de las actualizaciones relacionadas con la operación de las instalaciones de Covanta Essex, oportunidades de trabajo, actividades de la comunidad local y las respuestas a las preguntas más frecuentes. Por favor visita nuestro sitio web www.covanta.com/essex para suscribirte a nuestro boletín electrónico y obtener más información sobre nuestras instalaciones.

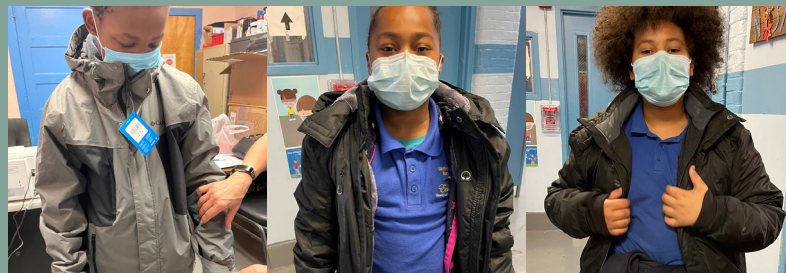
Bem-vindo!

Bem-vindo à primeira edição do Boletim Informativo Bianual da Covanta Essex! Leia sobre atualizações relacionadas com as operações das instalações da Covanta Essex, oportunidades de emprego, atividades da comunidade local e respostas a perguntas frequentes. Visite o nosso website em www.covanta.com/essex para se inscrever no nosso boletim informativo eletronicamente e para saber mais sobre as nossas instalações.

Community Events



Ms. Jones, the Hawkins Street Elementary School librarian, was concerned about her students staying warm during recess as the weather turned colder. Responding to this need, Covanta Essex Facility Manager Dave Blackmore and Community Outreach Manager Alyssa Wilds delivered hats and gloves to the school—for all 750 students!



In February, Hawkins Street School reached out to Covanta with another request for assistance that also pertained to keeping students warm. The school had noticed several students arriving without coats despite the cold winter weather. Without delay, Covanta ordered and delivered the coats to those students in need.

Question of the Quarter



What are some community benefits of the Essex Waste-to-Energy facility?

Our facility drives local sustainability in a number of ways...

Annually, Covanta Essex processes approximately 985,000 tons of waste that would otherwise end up in landfills, reduces greenhouse gas emissions equivalent to taking more than 180,000 passenger vehicles off the road for one year, generates enough electricity to continually power 45,000 homes and recycles enough metal to make a paper clip chain that wraps around the world 36 times! Additionally, we support the Newark community through local hires, commercial partnerships, and organizations, philanthropies and initiatives that help better our neighborhoods.

Come Join Our Team!

Shift Supervisor

Reviews, prioritizes and directs the daily activities of the operations group during the shift and fosters a culture of safety, environmental stewardship and operational excellence through team mentoring.

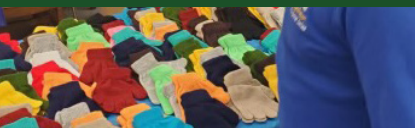
Plant Painter

Responsible for all aspects of facility painting. Must have knowledge in various surface preparations and applications of industrial coating to properly preserve structural steel throughout the facility.

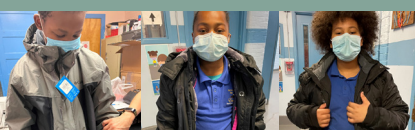
Mobile Equipment Mechanic

Maintains and repairs mobile mechanical, hydraulic and pneumatic equipment such as front-end loaders, forklifts, tractors, trailers and other light- and heavy-operating equipment in support of the facility's overall operations.

Eventos Comunitarios



La Sra. Jones, la bibliotecaria de la Escuela Primaria Hawkins Street, estaba preocupada porque sus estudiantes se mantuvieran calientes durante el recreo a medida que el clima se volvía más frío. En respuesta a esta necesidad, el Gerente de las Instalaciones de Covanta Essex, Dave Blackmore, y la Gerente de Alcance Comunitario Alyssa Wilds, entregaron gorros y guantes a la escuela, ¡para los 750 estudiantes!



En febrero, la escuela Hawkins Street se acercó a Covanta con otra solicitud de apoyo que también se refería a mantener a los estudiantes calientes. La escuela había notado que varios estudiantes llegaban sin abrigos a pesar del frío invierno. Sin demora, Covanta ordenó y entregó los abrigos a los estudiantes que los necesitaban.

Pregunta del Trimestre



¿Cuáles son algunos de los beneficios de la instalación de Conversión de Residuos en Energía de Essex para la comunidad?

Nuestras instalaciones impulsan la sustentabilidad local de varias maneras...

Anualmente, Covanta Essex procesa aproximadamente 985 000 toneladas de desechos que, de otro modo, terminarían en vertederos, reduce las emisiones de gases de efecto invernadero equivalentes a sacar de circulación a más de 180 000 vehículos de pasajeros durante un año, genera suficiente electricidad para abastecer continuamente a 45 000 hogares y recicla suficiente metal para hacer una cadena de sujetapapeles que dé la vuelta al mundo 36 veces! Además, apoyamos a la comunidad de Newark a través de contrataciones locales, asociaciones comerciales y organizaciones, filantropías e iniciativas que ayudan a mejorar nuestros vecindarios.

¡Ven y únete a nuestro equipo!

Supervisor de Turno

Revisa, prioriza y dirige las actividades diarias del grupo de operaciones durante el turno y fomenta una cultura de seguridad, administración ambiental y excelencia operativa a través de la mentoría del equipo.

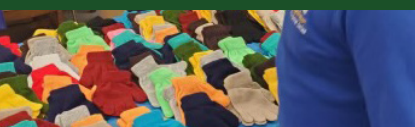
Pintor de la Planta

Responsable de todos los aspectos de la pintura de las instalaciones. Debe tener conocimiento en varias preparaciones de superficies y aplicaciones de revestimiento industrial para preservar adecuadamente el acero estructural de toda la instalación.

Mecánico de Equipos Móviles

Mantiene y repara los equipos mecánicos, hidráulicos y neumáticos móviles, como cargadores frontales, montacargas, tractores, trailers y otros equipos de operación pesada y ligera en apoyo a la operación general de la instalación.

Eventos da Comunidade



A Sra. Jones, bibliotecária da Escola Primária Hawkins Street, estava preocupada com o facto de os seus alunos se conseguirem manter quentes durante o intervalo, à medida que o tempo ficava mais frio. Respondendo a esta necessidade, Dave Blackmore, Diretor das Instalações da Covanta Essex, e Alyssa Wilds, Diretora de Extensão Comunitária, entregaram chapéus e luvas à escola para todos os 750 alunos!



Em fevereiro, a Escola Hawkins Street contactou a Covanta com outro pedido de assistência que também dizia respeito a manter os alunos quentes. A escola verificou que vários alunos chegavam à escola sem casacos, apesar do frio do inverno. Sem demora, a Covanta encomendou e entregou os casacos aos alunos necessitados.

Questão do Trimestre



Quais são alguns dos benefícios para a comunidade das instalações de produção de energia a partir de resíduos de Essex?

As nossas instalações impulsionam a sustentabilidade local de várias formas...

Anualmente, a Covanta Essex processa aproximadamente 985.000 toneladas de resíduos que, de outra forma, acabariam em aterros, reduz as emissões de gases com efeito de estufa (a um nível equivalente a retirar mais de 180.000 veículos de passageiros das estradas durante um ano), gera eletricidade suficiente para alimentar continuamente 45.000 casas e recicla metal suficiente para fabricar uma corrente de cliques de papel capaz de dar 36 vezes a volta ao mundo! Além disso, apoiamos a comunidade de Newark através de contratações, parcerias comerciais e organizações locais, bem como de filantropos e iniciativas que ajudam a melhorar os nossos bairros.

Junte-se à nossa equipa!

Supervisor de Turno

Revê, define prioridades e dirige as atividades diárias do grupo de operações durante o turno e promove uma cultura de segurança, gestão ambiental e excelência operacional através da orientação da equipa.

Pintor das Instalações

Responsável por todas as pinturas das instalações. Deve ter conhecimentos em várias preparações de superfície e aplicações de revestimento industrial para preservar adequadamente o aço estrutural em todas as instalações.

Mecânico de Equipamento Móvel

Mantém e repara equipamentos móveis mecânicos, hidráulicos e pneumáticos, tais como carregadores frontais, empilhadores, tratores, reboques e outros equipamentos de funcionamento leve e pesado em apoio às operações gerais das instalações.

Attachment 2

Covanta Essex Company ACO Requirements

Requirement	Description	Deadline	Required Due Date	Actual Completion Date
Phase I a)	COVANTA ESSEX COMPANY ("COVANTA") shall hire an independent public relations consultant or other similarly qualified consultant to develop a formal public outreach program and/or review and supplement as necessary, COVANTA's existing program if one either formally or informally exists. A plan, detailing the program, shall be developed and shall include, but not be limited to, procedures to provide timely updates on any operational upsets that result in permit excursions, periodic notifications to local community groups, including electronic and other agreed to forms of communication and the establishment of a website link. COVANTA shall reach out to local community groups to determine notification schedules and deliverables for purposes of planning and program development.	Within 30 calendar days of effective date of ACO	11/9/2020	11/6/2020
Phase I b)	The plan and program shall also provide that COVANTA conduct a community outreach event to communicate with local community groups on a bi-annual basis.	Bi-annual	Ongoing	12/16/2021
Phase I c)	COVANTA shall complete and submit the plan to the Department for comment.	Within 90 calendar days of effective date of ACO	1/7/2021	1/7/2021
Phase I c)	Within fourteen (14) calendar days after addressing any modifications to the plan, COVANTA shall initiate the planned program.	Within 14 calendar days of addressing NJDEP comments on Community Outreach plan	11/16/2021	11/16/2021 - Plan implementation was already in progress
Phase I d)	COVANTA shall hire an independent waste operations consultant to review and develop new protocols or supplement as necessary, COVANTA's existing waste receipt, inspection and handling protocols. Protocols shall include but are not limited to items listed below under Phase I d)i through v.	Within 30 calendar days of effective date of ACO	11/9/2020	11/6/2020
Phase I d)i	Procedures to increase education and outreach to all customers and haulers via direct communications with responsible entities and printed messaging on all invoice bills regarding acceptable/prohibited waste types.	Within 90 calendar days of effective date of ACO	1/7/2021	1/7/2021
Phase I d)ii	Specific procedures to address iodinated wastes including methodologies to identify potential generators/sources of these wastes, development of proactive steps to ensure these wastes are not included in the waste streams coming to the facility and inspection/interception protocols to ensure these waste types are not processed through the facility.	Within 90 calendar days of effective date of ACO	1/7/2021	1/7/2021
Phase I d)ii	As a potential measure for enhancing COVANTA's iodine waste inspection/interception protocols, iodine monitors shall be evaluated for their potential effectiveness to monitor vapor phase iodine. The evaluation shall be submitted to the Bureau of Air Monitoring within thirty (30) calendar days of the effective date of this ACO.	Within 30 calendar days of effective date of ACO	11/9/2020	11/6/2020

Requirement	Description	Deadline	Required Due Date	Actual Completion Date
	Response to NJDEP comments on iodine monitor evaluation received on 12/11/20	No required deadline for response	NA	4/6/2021
	Response to NJDEP comments on iodine monitor evaluation received on 5/18/21	No required deadline for response	NA	Call held on 6/29/21 to discuss comments
	Submittal of Halogenated Waste Pollution Prevention Plan report to NJDEP by July 30, 2021 pursuant to agreement made on call on 6/29/21	7/30/2021	7/30/2021	7/29/2021
Phase I d)ii	If the Department deems that the monitors are effective in monitoring vapor phase iodine, the monitors shall be installed, in accordance with Department review and approval, within 60 calendar days of such approval.	Within 60 calendar days of effective date of ACO	NA	NA
Phase I d)iii	Installation of Digital Cameras at appropriate locations throughout the facility to monitor waste streams being tipped in the transfer house and being conveyed into the boilers. The Digital Cameras should have recording capability and data retention that can record for 30 days.	Within 90 calendar days of effective date of ACO	1/7/2021	1/7/2021
Phase I d)iv	Additional dedicated training to employees responsible for 1) monitoring truck deliveries and unloading and 2) operating the grapples used to mix waste in the pit and transfer waste from the pit to the feed hopper for each boiler, to train the employees to identify inappropriate waste material.	Within 90 calendar days of effective date of ACO	1/7/2021	1/7/2021
Phase I d)v	Enhanced employee training program to ensure compliance with COVANTA's Solid Waste and Air Permits, applicable Best Management Practices, and procedures for identifying and preventing iodine from entering the Facility.	Within 90 calendar days of effective date of ACO	1/7/2021	1/7/2021
Phase I e)	Within ninety (90) calendar days of the effective date of this ACO, excepting the Iodine monitor evaluation noted in d)ii. above, COVANTA shall provide the protocols and procedures outlined above for Department comment.	Within 90 calendar days of effective date of ACO	1/7/2021	1/7/2021
Phase I e)	Within fourteen (14) calendar days after addressing any modifications to the protocols and procedures, COVANTA shall implement same. COVANTA is encouraged to proactively implement any enhanced protocols and procedures outlined above prior to the required 90-day due date	Within 14 calendar days of addressing NJDEP comments on Waste Receipt, Inspection and Handling protocols	5/7/2022	Response to NJDEP SW Permitting additional comments in progress
Phase II a)	Identification and estimation of air pollutant emissions and the air dispersion modeling of the impacts of the identified purple plumes shall be performed by an independent third party, and reports containing the air dispersion modeling results shall be submitted to the Department detailing the estimated potential health impacts associated with the purple plume events. Modeling shall include the impact of iodine associated acid gases with an estimation of emissions. Modeling reports shall be provided to the DEP by a qualified thirdparty modeling expert acceptable to the Bureau of Evaluation and Planning.	Within 45 days of protocol approval	7/23/2021	7/20/2021

Requirement	Description	Deadline	Required Due Date	Actual Completion Date
Phase II a)1.	Prior to conducting and modeling or health risk assessment COVANTA ESSEX COMPANY shall provide detailed estimates of all emissions associated with the purple plumes including, but not limited to, iodine and other associated acid gases and, the methodologies used to estimate the amount and duration of the emissions within 45 calendar days of the Effective Date of this ACO.	Within 45 calendar days of effective date of ACO	11/23/2020	11/19/2020
Phase II a)2.	Within 90 calendar days of the Effective Date of this ACO but prior to conducting and modeling or health risk assessment COVANTA ESSEX COMPANY shall submit a written protocol that is prepared by an independent third party for DEP approval to the Bureau of Evaluation and Planning that is consistent with a) Technical Manual 1002 Guidance on Preparing an Air Quality Modeling Protocol b) Technical Manual 1003 Guidance on Preparing Risk Assessment for Air Contaminant Emissions.	Within 90 days of effective date of ACO	1/7/2021	1/7/2021
	Response to NJDEP comments on air quality modeling protocol received on 2/26/21	Within 60 days of receipt of comments	4/26/2021	4/21/2021
Phase II a)3.	Once reviewed and approved by the Department, an independent third party shall conduct the modeling and risk assessment consistent with the protocol approval and submit results within 45 calendar days of Department approval.	Within 45 calendar days of protocol approval	7/23/2021	7/20/2021
Phase II a)4.	If upon completion of DEP's review of the modeling and risk assessment identified in Phase 2, Paragraph a.3 of this ACO, there are verified findings that the emission of the purple plumes caused a non-negligible health impact (See NJDEP Division of Air Quality Technical Manual 1003) to the public, Covanta shall disclose the findings to the public. In doing so, Covanta is encouraged to include posting the findings on its website. Covanta will disclose the non-negligible health impact within 5 days of receiving the verified findings.	Within 5 days of receiving non-negligible health impact results	NA	No non-negligible health impacts identified
Phase II b)	A mitigation plan shall be submitted to the Department for inclusion into COVANTA ESSEX COMPANY's Solid Waste and Title V permits. The mitigation plan shall consider findings from the evaluation of waste generators and how tipping floor procedures can be adjusted to improve a visual assessment of waste deliveries. Upon approval, the mitigation plan shall be referenced in the pending Title V Operating Permit renewal (BOP170001) under review by the Department and shall be incorporated into the renewal of the current Solid Waste Facility Permit (RRF190001) which expires February 23, 2021.	Plan shall be submitted upon approval by the Department of the protocols and procedures required to be submitted under Phase I e) within 90 days of effective date of ACO	1/10/2022	Modification of O&M manual to include procedures was submitted in response to SW Operating Permit NOD on 1/10/22. Additional revisions to be submitted in response to additional comments by 5/7/22. This will also be incorporated in the Title V renewal.

Requirement	Description	Deadline	Required Due Date	Actual Completion Date
Phase II c)	COVANTA ESSEX COMPANY shall provide a written report detailing efforts made at the facility located in Lancaster PA and operated by Covanta Lancaster, Inc. The report shall include information that explains the formation of purple plumes including the estimated iodine feed rate where the creation of a plume event has been made.	Within 60 calendar days of effective date of ACO	12/8/2020	12/7/2020
Item 14	All reports submitted to the Department shall be made available on COVANTA ESSEX COMPANY's website within one week of being submitted to the Department. This requirement shall exclude the report required and identified in Phase II, paragraph c.	Within 1 week of submittal of any required report to NJDEP.	Ongoing	Completed as applicable.
Item 17	<p>COVANTA ESSEX COMPANY shall submit progress reports to the Department by the first calendar day of every other month beginning 30 calendar days from the Effective Date of this ACO. Each report shall explain the status of COVANTA ESSEX COMPANY's compliance with the Compliance Schedule required by this ACO and shall include, but not be limited to, the following:</p> <p>A. identification of the site and reference to this ACO;</p> <p>B. the status of permitting and planning approvals, and any work at the site and progress to date;</p> <p>C. difficulties or problems encountered during the reporting period, and actions taken to rectify any difficulties or problems;</p> <p>D. activities planned for the next reporting period;</p> <p>E. the required and actual completion dates for each item required by this ACO;</p> <p>F. an explanation of any non-compliance with the compliance schedule; and</p> <p>G. evaluation of all corrective measures implemented to date.</p>	First calendar day of every other month beginning 30 calendar days from the effective date of ACO.	11/1/2021	5/2/2022 (Next report due by 5/1/22 (Sunday) so submitted on 5/2/22)
Item 18	In settlement of the violations cited in the above findings, COVANTA ESSEX COMPANY shall pay a penalty of \$24,400 (Twenty Four Thousand, Four Hundred Dollars) by check made payable to the "Treasurer, State of New Jersey" and remitted to the Division of Revenue at the address stated on the enclosed invoice(s) within thirty (30) calendar days of the Effective Date of this ACO.	Within 30 calendar days of effective date of ACO	11/9/2020	11/5/2020