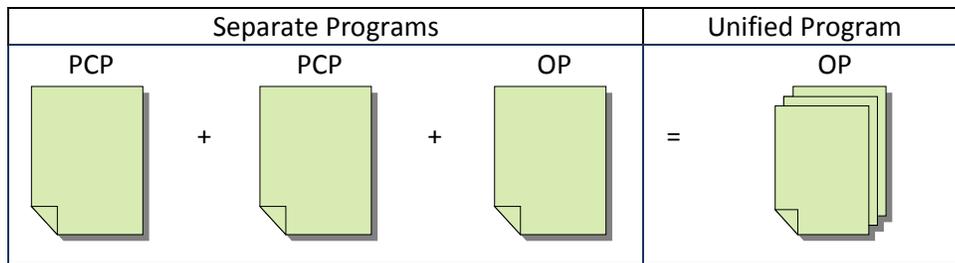


New Jersey's Title V Operating Permits
Permit Length and Size Distribution

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1. Title V of the 1990 Federal Clean Air Act Amendments requires all major facilities to obtain an operating permit. A Title V permit grants a federally regulated source permission to operate. The permit includes all air pollution requirements that apply to the source, including emissions limits and monitoring, record keeping, and reporting requirements.
2. New Jersey opted for a “unified” major facility permit program that combines two distinct elements of air permitting, (1) New Source Review (NSR) for new and modified equipment, and (2) operating permits for existing equipment. A unified program provides a “one-stop” shop for all air permitting activities for major facilities.



3. Title V permits issued by New Jersey consolidated hundreds of individual air permits for equipment at some major facilities into one comprehensive “stand alone” document which clarifies all air pollution control requirements for a facility.
4. The size of the operating permit is directly proportional to the following:
 - Number of pieces of equipment
 - Number of control devices
 - Number of operating scenarios
 - Number of applicable requirements
 - Complexity of source operation
5. New Jersey’s comprehensive Title V permits, delineated in an easy to understand four-column format, resolve questions about what state, local, or federal requirements apply to a given source and assure that issued permits cover all applicable State and Federal requirements. These permits enable facilities to understand fully their compliance obligations.

Check the Size Distribution of New Jersey’s Operating Permits on the next page.

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New Jersey's Operating Permits consists of the following components:

- A compliance plan (all applicable requirements)
- A boilerplate that includes authorities and general provisions
- Equipment and control device inventories
- Supplemental detail forms for equipment and control devices

The compliance plan covers all applicable State and Federal requirements, including monitoring, recordkeeping, and reporting requirements, and enable facilities to understand their compliance obligations.

To address the concerns of regulated entities regarding permit size, we collected data to know the number of pages in the compliance plan of each permit. As shown below very few large facilities have large permits and most other facilities falls into medium and small categories.

The vast majority of operating permits, 60%, contain less than 100 pages. 29% of the permits are between 100-200 pages and 10% of the permits have 200-400 pages. Only 1% of the permits for very large facilities contain more than 400 pages.

