



STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CONSTRUCTION

REPAIR

MAINTENANCE



Donna Summers
April 10, 2013
ACE Academy



My Contact Info

Donna Summers

NJDEP – Air Compliance & Enforcement

Southern Regional Office

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Ground Rules

- Ask questions anytime
- CRM = Construction Repair Maintenance
- SOTA = State Of The Art

CONSTRUCTION



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION


Division of Air Quality
Air Quality Permitting Element
401 E. State Street, 2nd floor, P.O. Box 27
Trenton, NJ 08625-0027


JON S. CORZINE
Governor


MARK MAURIELLO
Acting Commissioner

MEMORANDUM

TO: Air Quality Permitting Supervisors and Evaluators
Air Compliance and Enforcement Field Staff

THROUGH: Edward Choromanski, Administrator, Air Compliance and Enforcement 

THROUGH: John Preczewski, P.E., Assistant Director, Air Quality Permitting Program 

FROM: Francis C. Steitz, Chief, Bureau of Air Permits 

SUBJECT: Air Quality Permit Applicability at Construction Sites

DATE: January 6, 2010

January 6, 2010

This document provides guidance to Air Quality Staff in determining when Air Quality Permits, pursuant to N.J.A.C. 7:27-8 or N.J.A.C. 7:27-22, are required at a construction site as defined below. Section I outlines the types of equipment which require an Air Quality Permit. Section II identifies the types of equipment which do not require an Air Quality Permit.



"Construction site" means an area or location on a piece of property where construction is temporarily occurring, and which has a finite completion date. Construction includes, but is not limited to the creation, assembly, repair, maintenance or demolition of buildings, transportation infrastructure (roads, bridges, tunnels, railroads, marine installations etc), landscape (parks, recreational locations, etc), or other structures. A construction site is not a location involved in a continuous (non-temporary) operation, or where a production process is involved. Property may include both a construction site area, and a production area.



REPAIR

MAINTENANCE

TWO TYPES: Type 1 - Tool



- equip itself does the CRM work
- just a tool needed to directly do CRM work
- don't normally need this equip
- Not replacing anything...just an extra temporary “tool”



TWO TYPES: Type 2 - Replacement

- equip replaces a source undergoing CRM
- do normally use the equip
- replacement source needed because of and during CRM



COMPARISON OF TWO TYPES

- Equip itself does the CRM work
- Portable
- < 1 yr
- Emission limits: none
- No notification needed

- Equip replaces a source undergoing CRM
- Portable
- < 90 days
- Emission limits: <SOTA
- YES notification needed



NOTIFICATION PROCESS



NOTIFICATION

- Free
- 2x: before (due anytime)
& after (due within 30 days)
- Electronic.....website



NJDEP Online - Windows Internet Explorer

https://www11.state.nj.us/DEP_RSP/Orchestrate.do?initiate=true&orchestrationId=Core-Workspace#skip_to_2

File Edit View Favorites Tools Help

Search

njhome | citizen | business | government | services A to Z | departments

new jersey njdep department of environmental protection njdep online

My Workspace User Profile Certifications Payments Documents and Forms Permit Folder

Version: 4.12
Currently logged in: Donna Summers (DSUMMERS) Help | Logout

MY WORKSPACE

Service Selection

Note: Access to this electronic service selection and submittal area is granted by selecting facilities using the [user profile](#). Some services are accessible without selecting facilities as shown below.

Division of Water Quality NJPDES Monitoring Reports (DMRs, WCRs, RTRs) Dental Waste Registration - New Dental Waste Registration - Renewal Stormwater Construction General Authorization MSRP Annual Report	Site Remediation LSRP-Related Services Remedial Priority System (RPS)
Air Program RADIUS File Submission General Permits Permit/Certificate Folder NOx RACT Combustion Adjustment Excess Emission Monitoring Performance Reports (EEMPR) Periodic Compliance Certification Diesel Retrofit Program	Solid and Hazardous Waste eWaste Annual Report eWaste Collection Plan eWaste Renewal Registration
	Division of Land Use Regulation Apply for Land Use Permit
	Right to Know and Pollution Prevention Program Community Right To Know Survey Release and Pollution Prevention Report and Pollution Prevention Plan Summary
	Underground Storage Tank (UST) Program UST Notice of Intent to Close

Done Internet 100% 9:34 PM

Version: 4.12
 Currently logged in: Donna Summers (DSUMMERS)

DOCUMENTS AND FORMS

Air Program				
RADIUS File Submission	HTML	PDF	Word	Excel
User Guide for Online RADIUS Submittals				
RADIUS Certification Authorization Form				
General Permits				
HTML	PDF	Word	Excel	
User Guide to Preparing General Permits in NJDEP Online				
General Procedures for General Permits				
General Permit Requirements for Bulk Solid Materials Receiving and Storage Systems (GP-001)				
General Permit Requirements for Confined Abrasive Blasting Equipment (GP-002)				
General Permit Requirements for Woodworking Equipment (GP-003)				
General Permit Requirements for Storage and Transfer of Service Station Fuels at Gasoline Dispensing Facilities (GP-004)				
General Permit Requirements for Emergency Generator (GP-005)				
General Permit Requirements for Stationary Non-Floating Roof Storage Tank(s) Storing Volatile Organic Compounds (VOCs) (GP-007)				
General Permit Requirements for Site Remediation Activities for Gasoline Contamination at Vehicle Fueling Stations (GP-008)				
General Permit Requirements for Boiler(s) And Other Indirect Fired External Combustion Equipment [≥ 10 MMBTU/hour and < 50 MMBTU/hour] (GP-009)				
General Permit Requirements for Non-HAP VOC Solvent Degreasing Operations (GP-010)				
General Permit Requirements for Methylene Chloride or 1,1,1 Trichloroethane Solvent Degreasing Operations (GP-011)				
General Permit Requirements for Perchloroethylene Drycleaning Equipment (GP-012A)				
General Permit Requirements for Non-HAP Drycleaning Equipment (GP-013)				
General Permit Requirements for Storage and Transfer of Service Station Fuels using only Stage 1 Vapor Recovery (GP-014)				
Small Emitter General Air Permit (SEGAP) (GP-016)				

Division of Water Quality				
NJPDES Monitoring Reports (DMRs, WCRs, RTRs)	HTML	PDF	Word	Excel
About NJPDES EDI				
EDI Registration/Agreement				
NJPDES EDI Reference Manual				
Dental Waste Registration - New				
HTML	PDF	Word	Excel	
Dental Amalgam Waste Terms and Conditions				
Dental Waste Registration - Renewal				
HTML	PDF	Word	Excel	
Dental Amalgam Waste Terms and Conditions				
Stormwater Construction General Authorization				
HTML	PDF	Word	Excel	
Construction Activities (5G3)				
MSRP Annual Report				
HTML	PDF	Word	Excel	
MSRP Login Registration Guide				
2011 Tier A Annual Report				
2011 Tier B Annual Report				
2011 Highway Agency Annual Report				
2011 Public Complex Annual Report				
Enforcement				
Construction, Repair and Maintenance (CRM)				
HTML	PDF	Word	Excel	
CRM Initial Notification				
CRM Final Notification				
Permit Applicability for Equipment and Source Operations Operated During Construction, Repair and Maintenance Events Memorandum				
Excess Emission Monitoring Performance Reports (EEMPR)				
HTML	PDF	Word	Excel	
Excess Emission Monitoring Performance Reports (EEMPR) Documentation				



State of New Jersey

DEPARTMENT of ENVIRONMENTAL PROTECTION

INITIAL NOTIFICATION TO TEMPORARILY REPLACE PERMITTED SOURCE OPERATIONS SHUTDOWN DURING CONSTRUCTION, REPAIR, AND MAINTENANCE ACTIVITIES

Submittal Information and Mailing Instructions

This form must be submitted prior to the operation of any temporary replacement permitted equipment or source operations. This form can be submitted as a Word document or as a PDF email attachment to the appropriate Regional Office's email address listed at the end of this document. If unable to e-mail the registration, a printed signed copy can be mailed or faxed to the appropriate Regional Office listed at the end of this document.

SECTION A: FACILITY INFORMATION

FACILITY NAME PROGRAM INTEREST (PI#)

STREET ADDRESS
NO. / STREET / CITY / COUNTY / ZIP CODE

FACILITY/SITE CONTACT

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
NAME	TITLE	TELEPHONE	EMAIL

SECTION B: CONSTRUCTION, REPAIR, AND MAINTENANCE (CRM) ACTIVITY

EXPECTED START DATE: <input type="text"/> (MM/DD/YYYY)	EXPECTED DURATION: <input type="text"/> DAYS - ALERT - NOT TO EXCEED 90 CONSECUTIVE DAYS
BRIEF DESCRIPTION OF CRM ACTIVITY (E.G. WHY REPLACEMENT EQUIPMENT IS NEEDED, ETC.) - ATTACH ADDITIONAL SHEET(S) IF NEEDED	
<input type="text"/>	

SECTION D: SHUTDOWN SOURCE OPERATION BEING REPLACED BY TEMPORARY SOURCE OPERATION LISTED IN SECTION C ABOVE

NJDEP ACTIVITY # (E.G. PCP 0000001)	EQUIPMENT NJID	ADDITIONAL DESCRIPTION (E.G. EMISSION UNIT #)
Select from Drop-Down	E	
Select from Drop-Down	E	
Select from Drop-Down	E	
Select from Drop-Down	E	
Select from Drop-Down	E	

NJDEP Regional Enforcement Offices

Central Region - Burlington, Mercer, Middlesex, Monmouth, and Ocean Counties
22 S. Clinton Avenue, 4 Station Plaza, PO Box 420, Mail Code 22-03A, Trenton, NJ 08625-0420
Ph: 609-292-3187, Fax: 609-292-6450, AirC&E-Central@dep.state.nj.us

Southern Region - Atlantic, Camden, Cape May, Cumberland, Gloucester, and Salem Counties
2 Riverside Drive, Suite 201, Camden, NJ 08103, Ph: 856-614-3601, Fax: 856-614-3613, AirC&E-Southern@dep.state.nj.us

Northern Region - Bergen, Essex, Hudson, Hunterdon, Morris, Passaic, Somerset, Sussex, Union, and Warren Counties
7 Ridgedale Avenue, Cedar Knolls, NJ 07927, Ph: 973-656-4444, Fax: 973-656-4080, AirC&E-Northern@dep.state.nj.us

What info is needed for the INITIAL notif.

- Contact info
- PI#
- Permit # E# U# of source being replaced
- Start date / expected duration
- Project description
- Equipment specs of source being brought onsite
 - make / model / serial #
 - size (BTU, kw)
 - fuel consumption rates (gal/hr, etc)

What info is needed for the FINAL notif.

- Contact info
- PI#
- ACTUAL start/end dates, total duration
- Quantity emissions

Tons/yr

Must be reported in Emission Statements (sub21)

6 pollutants: TSP PM-10
 NOx CO
 SO2 VOC



3 Regional Enforcement Office

- **Northern – Ph # 973- 656- 4444**
Bergen, Essex, Hudson, Hunterdon, Morris, Passaic, Somerset, Sussex, Union, Warren
- **Central – Ph # 609- 292- 3187**
Mercer, Middlesex, Monmouth, Burlington, Ocean
- **Southern – Ph # 856- 614- 3601**
Atlantic, Camden, Cumberland, Cape May, Gloucester, Salem

Speculative use does NOT qualify for CRM

ex bringing onsite backup generators as part of storm preparation efforts, just in case the power goes out during a weather event



FAQ

Q: What if 90 days isn't long enough?

A: - 90 day limit can't be extended via CRM
- Will be handled on case-by-case basis
- May result in enforcement action



Q: Can I move the equipment around?

A: Can not move the equipment on & off site in order to circumvent the 90 day rule

CAN move the equipment around different areas of your property for a TOTAL of 90 days (NOT 90 days at each area)


Q: What is a Replacement Source?

A: Need NOT be an exact duplicate
Must be similar in design, function &
purpose

ex) a boiler replaced by a boiler

Even a nat gas boiler replaced by an oil-
fired boiler can be ok.






Make every
reasonable effort
to minimize emissions

For example:

- Rent clean equip from reputable dealers
- Use clean fuel
- Don't run more than necessary
- Be responsible



Make every
reasonable effort
to minimize emissions

ONLINE RESOURCES

The screenshot shows the NJDEP Air Quality Permitting Program (AQPP) website. The browser window title is "NJDEP Air Quality Permitting Program (AQPP) - Windows Internet Explorer". The address bar shows "http://nj.gov/dep/aqpp/". The page header includes "NJ Home | Services A to Z | Departments/Agencies | FAQs" and a search bar. The main content area features the "AQPP Air Quality Permitting Program" logo and a navigation menu on the left. The "Permitting Guidance" link is highlighted with a pink arrow and box. The central text block states: "The Air Quality Permitting Program is responsible for permitting and testing stationary sources of air pollution (e.g., factories, power plants, etc.) - both old sources (those already constructed) and newer facilities - to ensure they do not adversely affect air quality in your neighborhood or anywhere in the state. To accomplish this, the staff of the AQPP reviews air pollution control permit applications, evaluates air quality impact and health risks; and ensures stack emissions are measured properly." The right-hand sidebar contains sections for "Program Update" and "Other Programs of Interest".

- Construction Repair and Maintenance
- Permit Applicability at Construction Sites
- Temporary Equipment

www.nj.gov/dep/aqpp

Permitting Guidance

SOTA


Quality Permitting Program (AQPP)

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

AQPP Air Quality Permitting Program

NJDEP Home | DEP Online | AQPP Home | Radius | Radius FAQ | Contact AQPP

- Air Permit Information**
 - Applications & Forms
 - General Permits
 - Online Permitting Help
 - Permitting Guidance
 - Public Notices
- RADIUS Information**
 - RADIUS
 - RADIUS FAQ
 - RADIUS Reference Tables
- Program Information**
 - Annual Combustion Adjustment
 - AQ Forecast for Emergency Gen.
 - MACT
 - Risk Assessment Guidance
 - State of the Art**
 - Technical Manuals



The Air Quality Permitting Program is responsible for permitting and testing stationary sources of air pollution (e.g., factories, power plants, etc.) - both old sources (those already constructed) and newer facilities - to ensure they do not adversely affect air quality in your neighborhood or anywhere in the state.

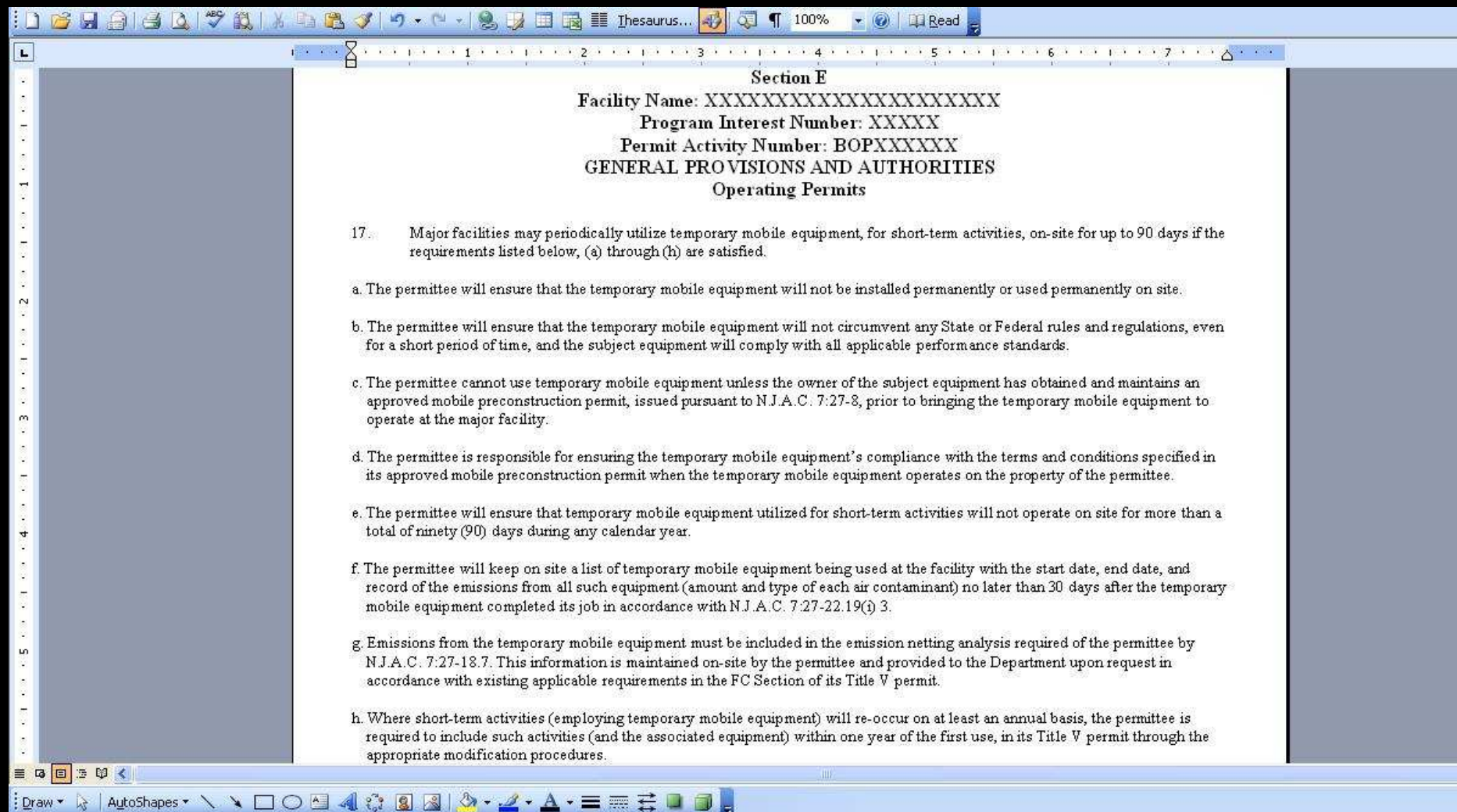
To accomplish this, the staff of the AQPP reviews air pollution control permit applications, evaluates air quality impact and health risks; and ensures stack emissions are measured

- Program Update**
 - GP-009A Now Available
 - Revisions to Rules to address PM-2.5
 - electronic Netting Analysis Tool (eNAT)
 - AQPP Implementation Plan (Revised 2/11/2013)
 - Application Checklist for Air Permits
 - Amended Fee Schedule Commences 1/1/2010
 - Help for Printing Certificates, Paying Renewals and Processing General Permits
 - Transferring Ownership of Air Preconstruction Permits
 - Revised PM-2.5 Permitting and Modeling Procedures
- Other Programs of Interest**
 - Air Compliance and Enforcement
 - Air Toxics
 - Bureau of Air Quality Monitoring
 - Bureau of Air Quality Planning

www.nj.gov/dep/aqpp

SOTA: ton/yr limits only....no hourly limits





Another option for Title V facilities only - Operating Permit General Provision #17

must meet a through h.... Max 90 days, owner must permit the equip, fac must comply with that permit, keep records, meet all state/federal regs, etc

QUESTIONS ???

