

December 6, 2011 ACE Academy Training Q & A Follow-up:

1. Is there a general permit that can be used for a printing operation?

Answer: No, at this time we don't have a General Permit for Printing Operations.

2. What if a facility has done the required Annual Combustion Adjustment for their boilers, they have all the paperwork to demonstrate compliance, but have not yet reported the results electronically as required?

Answer: The results of the Annual Combustion Adjustments are required to be submitted electronically in accordance with N.J.A.C. 7:27-19.16 (c) and (d), therefore, the results should be submitted electronically as soon as possible even if the results are 2-3 years old. Two things to remember: 1). Conduct Annual Combustion Adjustment during the same quarter period every year 2). Submit results electronically within 45 days of conducting the Adjustment.

3. How does DEP enforce Federal Regulations?

Answer: If the applicable federal regulations are listed in your state issued permit, then the requirements are enforceable by the DEP. Federal regulations that have not been delegated to NJDEP or not included in the state issued permit are referred to EPA for further investigation/enforcement action.

4. What does "Referred to EPA" mean?

Answer: "Referred to EPA" means that a potential violation will be forwarded to EPA for further action. EPA will review, investigate and issue enforcement action(s) to the facility as deemed appropriate by EPA.

EPA recently offered a webinar on National Emission Standard for Hazardous Air Pollutants (NESHAP) for **Reciprocating Internal Combustion Engines (RICE)** – 40 Code of Federal Regulations 63, Subpart ZZZZ (4Z). Please click on the following link for additional guidance and to see their PowerPoint Presentations. There is also a "Regulation Navigation Tool" which is really helpful in determining if your facility is subject to 4Z and what you need to do to comply with the regulation.

<http://www.epa.gov/region1/rice>

Audience Questions, Sulfur Content in Fuel (Subchapter 9)

Presenter: Donna Summers

Q: What is the relationship between ppm sulfur and % sulfur?

A: 500 ppm sulfur (low sulfur fuel)	is equivalent to	0.05%	by weight sulfur
15 ppm sulfur (ultralow sulfur fuel)	is equivalent to	0.0015%	by weight sulfur
2,500 ppm sulfur	is equivalent to	0.25%	by weight sulfur
3,000 ppm sulfur	is equivalent to	0.3%	by weight sulfur
5,000 ppm sulfur	is equivalent to	0.5%	by weight sulfur

Q: Is there a minimum quantity of fuel-oil that I must use before triggering these sulfur requirements?

A: No. There is no minimum threshold that must be met. If you burn any quantity of fuel oil, however small that quantity is, then the N.J.A.C. 7:27 – 9 sulfur requirements apply to you.

Q: I’m confused as to your use of the word “same” in your final recap slide, the one that summarizes which limits apply to which fuel type, in which year. Do you mean “same as above”, or “same as prior year”. Please clarify.

A: See attached slide. This revision should clarify the matter. The word “same” has been removed, and replaced with clearer language.

Q: What records must I keep?

A: The rule itself is silent on the issue, and requires no specific recordkeeping.

HOWEVER, you most likely have some very specific fuel recordkeeping requirements in your air permit...first and foremost, always follow your permit. A typical permit requirement for fuel recordkeeping will read something like this:

For each fuel oil delivery received, the Permittee shall review written documentation of the delivery to ensure the maximum allowable fuel oil sulfur content is not being exceeded. Such written documentation can include but is not limited to: Bill of Lading, Delivery Invoice, Certificate of Analysis, etc.

Even if you don’t have a permit that requires specific fuel recordkeeping (and even though the rule itself is silent on the matter), you **STILL** must have reasonable records onsite to show to an inspector, so that they may determine if you are in compliance with the sulfur limits or not. In this case, you may choose to keep any records you wish, in any format you wish, as long as they reasonably and clearly demonstrate your sulfur content.

Remember that most fuel delivery companies **DO NOT** specify sulfur on their delivery receipts. You often have to request that it be added, or request an MSDS, or request a Certificate of Analysis from them...something that shows the sulfur content of the fuel being delivered to you.

FINAL RECAP – sub9 Sulfur in Fuel

#2 500 ppm (2014) oil	drops to 15 ppm (2016)	no more zones
#4 2,500 ppm (2014) oil	still 2,500 ppm (2016)	no more zones
#6 3,000 ppm (2014) oil 5,000 ppm (2014)	still 3,000 ppm (2016) still 5,000 ppm (2016)	keeping zones 4 & 6 all other zones

Follow-Up for 40 CFR Part 63, Subpart JJJJJJ Training

National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers

Who is affected by this rule?

Most boilers covered by the Boilers Area Source NESHAP are located at commercial and institutional facilities, with a smaller amount in the industrial sector. This rule covers boilers located at area source facilities that burn coal, oil, biomass, or other solid and liquid non-waste materials.

Area sources are commercial (laundries, apartments, hotels), institutional (schools, churches, medical centers, municipal buildings) or industrial (manufacturing, refining, processing, mining) facilities that emit or have the potential to emit less than 10 tons per year of a single [hazardous air pollutant](#), or less than 25 tons per year of combined hazardous air pollutants.

This rule does NOT apply to boilers that burn only gaseous fuels or any solid waste. Commercial boilers include those found in stores/malls, laundries, apartments, restaurants, and hotels/motels. Institutional boilers are found in many locations, including medical centers (hospitals, clinics, nursing homes), educational and religious facilities (schools, universities, churches), amusement parks, and municipal buildings (courthouses, prisons). Industrial boilers are found in manufacturing, processing, mining, and refining or any other industry.

Boiler size is expressed in terms of rated design heat input capacity and is measured in million British thermal units per hour, or MMBtu/hr.

To determine the size of your boiler, check the nameplate on the boiler. The nameplate often lists the rated heat input capacity on the unit. Also, this rated capacity may have also been reported to the entity insuring the boiler or to the state labor and safety inspector.

New vs. Existing Sources

You have an existing source if:

- You commenced construction or reconstruction of the boiler on or before June 4, 2010. You have commenced construction or reconstruction if you have a contractual obligation to undertake and complete construction or have begun the act of construction on the boiler.

You have a new source if:

- You commenced construction or reconstruction of the boiler after June 4, 2010 and you met the applicability criteria at the time you commenced construction or,
- You switched from firing natural gas fuel to a solid fossil fuel, biomass, or liquid fuel after June 4, 2010.

Conduct Tune-ups

Boilers subject to tune-ups must have a tune-up conducted every 2 years.

The following boilers are required to have a tune-up:

- New and existing coal-fired boilers having a heat input capacity of less than 10 MMBtu/hr
- All biomass-fired and oil-fired boilers

You must complete the initial tune-up by the following dates:

- **Existing Sources:** No later than March 21, 2012
- **New Sources:** No later than May 20, 2011 or upon start-up of the boiler, whichever is later

Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. If the unit is not operating on the required date, the tune-up must be conducted within one week of startup.

See the Tune-up Guidance and Example Recordkeeping Form at

<http://www.epa.gov/ttn/atw/boiler/boilerpg.htm>

If you not sure about something check out this COMPLIANCE GUIDE at:

http://www.epa.gov/ttn/atw/boiler/imptools/area_sm_biz_compli_guide_appx.pdf

If you're still not sure, contact your local NJDEP Air C&E Field Office.

If we have missed answering a question that was raised during the December 6th ACE Academy training and you would like to talk to someone for further clarification; please call the appropriate Regional Office for assistance. Thanks.