



**New Jersey Department of Environmental Protection
Division of Air Quality**

Attachment to the RADIUS Air Operating Permit Renewal Application

Submittal Date: _____

Facility Name: _____

PI#: _____

This package must be submitted as an attachment to the RADIUS Air Operating Permit Renewal Application. The forms contained in this package must not be altered. Use of any non-standard forms will require resubmittal of the renewal application. If the file is too large to submit, please perform a Save As to optimize the file for Fast Web View using Adobe PDF software. Contact the Department if this does not solve the problem, and you still have issues submitting this package.

**New Jersey Department of Environmental Protection
401 East State Street, 2nd Floor, P.O. Box 420, Mail Code 401-02, Trenton, NJ 08625-0420**

Operating Permits Helpline 609-633-8248

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Applying for an Air Operating Permit Renewal

This summary was prepared to assist you in renewing an operating permit. To continue lawful operation of a facility that has obtained an approved operating permit, a permittee must initiate the renewal of the operating permit by submitting a timely and administratively complete permit application. A complete operating permit renewal application consists of the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package, along with any supporting documents (if needed).

1. **Timely**

To be considered timely pursuant to N.J.A.C. 7:27-22.30(c), the Department must receive an administratively complete renewal application at least 12 months prior to expiration of the operating permit. The applicant is encouraged to voluntarily submit the renewal application at least 15 months prior to expiration of the operating permit, so that any deficiencies in the application can be addressed prior to the application due date. Only applications, which are administratively complete by the application deadline, will be eligible for coverage by an application shield.

2. **Administratively Complete**

To be deemed administratively complete pursuant to N.J.A.C. 7:27-22.30(d), an operating permit renewal application must include all information requested in the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package.

3. **Application Shield**

The Department will grant an application shield when a timely and administratively complete application is received pursuant to N.J.A.C. 7:27-22.30(g). An application shield grants the right to operate the facility upon the expiration of its operating permit. If an operating permit has expired, the conditions of the operating permit remain enforceable until the operating permit is reissued. Unless a facility obtained an application shield, the right to operate the facility terminates upon the expiration of its operating permit pursuant to N.J.A.C. 7:27-22.30(i).

4. **Permit Changes During Renewal Process**

Minor changes, such as those that would qualify for a seven-day-notice change or administrative amendment, may be made with the renewal pursuant to N.J.A.C. 7:27-22.30(d). Significant changes, such as those qualifying for a minor or significant modification, must be submitted as a separate permit application. The Department at its discretion may include approval of these proposed changes along with the approval of the renewal application.

5. **New HAP Reporting Thresholds**

Pursuant to N.J.A.C. 7:27-22.30(l), for any operating permit expiring on or after February 12, 2021, HAP emissions from a source operation that equal or exceed the reporting threshold specified in N.J.A.C. 7:27-17.9(a) must be included during this operating permit renewal process. For any instance in which a HAP is being added or revised solely due to a change in the reporting threshold, the HAP(s) may be included by submitting emission calculations as an attachment to the renewal application. Otherwise, the HAP(s) must be included through the submittal of a permit modification application pursuant to N.J.A.C. 7:27-22.23 or N.J.A.C. 7:27-22.24 as applicable. If you are unsure how to proceed, please contact the Department at (609) 633-8248.

6. **Changes to Insignificant Source Operations**

A permittee may, pursuant to N.J.A.C. 7:27-22.21(a), make certain changes to an insignificant source operation, or to the use thereof, without notifying the Department or EPA until the renewal of the operating permit. In the application for the renewal of the operating permit, the permittee shall identify any such changes which affect information in the operating permit. Such changes could include the addition or deletion of insignificant source operations that have occurred during the term of the operating permit. Additions and revisions to existing insignificant source operations shall be made by completing the Insignificant Source Emissions screen in RADIUS, while deletions shall be requested in the Reason for Application screen in RADIUS.

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Section 1 Compliance Requirements

A. Compliance Assurance Monitoring (CAM) Applicability Determination

EPA developed 40 CFR 64 (Compliance Assurance Monitoring or "CAM") in order to provide reasonable assurance that facilities comply with emission limitations by monitoring the operation and maintenance of their control devices. In general, CAM applies to emission units that meet all of the following conditions:

1. The emission unit is located at a major source for which a Title V permit is required;
2. The emission unit is subject to an emission limitation or standard for a specific contaminant;
3. The emission unit uses a control device to achieve compliance with that specific contaminant's federally enforceable limit or standard;
4. The emission unit has potential pre-control or post-control emissions (of that specific contaminant) of at least 100% of the major source amount (see 40 CFR 64.2 - "Major facility"); and
5. The emission unit is not otherwise exempt from CAM (for exemptions, see 40 CFR 64.2(b)).

To learn more about the CAM program and for guidance on how to prepare a CAM plan, check EPA's website: <https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring>.

After reviewing the information above, check the following boxes as applicable:

- NO**, my facility **does not** have any emission units subject to CAM requirements.
- YES**, my facility **does** have one or more emission units subject to CAM requirements, and
- A CAM plan is provided with this operating permit renewal application.
 - A CAM plan will be submitted during the technical review of this renewal application.

B. Health Risk Assessment

1. Consistent with N.J.A.C. 7:27-22.3(cc), the Department will review each operating permit renewal application to ensure that emissions of Hazardous Air Pollutants (HAPs) do not pose a public health risk.
2. After receipt of the renewal application, the Department will notify applicants if a Facility-Wide Risk Assessment must be performed. A plot plan and air dispersion modeling protocol will be required in that case.
3. Previous Facility-Wide Risk Assessment, additions and changes in toxicity values or standards, and changes in the air model and/or the facility's location (in an Environmental Justice area, near a sensitive population etc.) will determine the need for health risk assessment.

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C. Acid Rain Program

To learn more about Acid Rain Program, check EPA's website: <https://www.epa.gov/airmarkets/acid-rain-program>.

Check the following boxes as applicable:

- NO**, this facility **is not subject** to the Acid Rain Program, codified at 40 CFR 72.
- YES**, this facility **is subject** to the Acid Rain Program, codified at 40 CFR 72, and
 - There have been no changes affecting my facility's Acid Rain Permit and a renewal application is provided with this operating permit renewal application.
 - There have been changes affecting my facility's Acid Rain Permit and a revised/updated application is provided with this operating permit renewal application.

D. N.J.A.C. 7:27-18 Netting Analysis and General Operating Permit Determination

Air permit applications requesting air emissions increases are required to include a netting analysis to determine if the resulting net emission increase at the facility constitutes a significant net emission increase pursuant to N.J.A.C. 7:27-18.7. These netting analyses must be kept on site or submitted to the Department consistent with the Department's guidance included in the memo listed under "N.J.A.C. 7:27-18 Netting Analysis" and the "General Procedures for General Operating Permits" on the Department's webpage <http://www.state.nj.us/dep/aqpp/permitguide.html> and <http://www.state.nj.us/dep/aqpp/gop.html>, respectively. The Department intends to review these analyses at least once in 5 years unless no permit modifications proposing emissions increases were made and no GOPs were obtained during the past 5-year permit term. All netting analyses corresponding to a modification to increase emissions or a GOP must be submitted to the Department. Any netting analyses submitted with a modification application during the 5-year permit term do not need to be submitted again with the permit renewal application.

Check the following boxes as applicable:

- NO**, this facility **has not made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal.
- YES**, this facility **has made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal, and
 - One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, were provided with a modification application during the 5-year permit term.
 - One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, are provided with this permit renewal application.
 - One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, will be submitted during the technical review of this permit renewal application.

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Section 2
Certification

No additional certification is required when submitting the operating permit renewal application through NJDEP Online: <http://www.nj.gov/dep/online/>.

Complete the information below when submitting the operating permit renewal application on an electronic storage device, through the mail. Click on the icon on the signature line to add an image of a signature saved on your computer. If you do not have one, print the form out and manually sign on the line.

Facility PI#: _____

Facility Name: _____

Responsible Official:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document 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.

Name: _____ Signature: _____ Date: _____

Individuals with Direct Knowledge:

I certify under penalty of law that I believe the information provided in this document 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.

Name: _____ Signature: _____ Date: _____

Section Being Certified: _____

Name: _____ Signature: _____ Date: _____

Section Being Certified: _____

Name: _____ Signature: _____ Date: _____

Section Being Certified: _____

Name: _____ Signature: _____ Date: _____

Section Being Certified: _____

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Section 4
Summary of the results from Stack Testing and Monitoring

Instructions

Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No

Make additional copies of this form if needed.

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Section 5 **Compliance Status**

Instructions

Please read these instructions prior to completing the following form.

1. **Subject Item**: List each subject item from Section D, Compliance Plan and Inventories, of the operating permit in this column. Subject items include Facility (FC), Group (GR), Non-Source Fugitive Emissions (FG), Insignificant Source (IS), Batch Process (BP), and Emission Unit (U). (Operating Scenario and Reference Numbers are required only for Non-Compliance permit requirements. See item 2 below).
2. **Compliance Status**: Provide compliance status for each subject item in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "In Compliance". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and write "Non-Compliance" in the 2nd column. (Reference Numbers for each applicable requirement are located in the first column of Facility Specific Requirements, Section D of the permit).
3. **Method Used to Determine Compliance**: Describe how compliance was determined in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "Consistent with all methods listed in monitoring and recordkeeping permit requirements". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and provide specific method used to determine compliance in the 3rd column.
4. **Compliance Schedule**: insert a "No" if there are no compliance schedules included in this application to address non-compliance issues for which "Non-Compliance" was inserted in the 2nd column. Insert a "Yes" if a compliance schedule is included in this renewal application to address non-compliance issues in the approved permit or non-compliance issues disclosed in this application.

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**Section 5
Compliance Status**

Instructions

Read the instructions on the previous page before completing this form.

Subject Item	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
OS / Ref #			
<i>Subject Item</i>			
<i>OS / Ref #</i>			
<i>Subject Item</i>			
<i>OS / Ref #</i>			
<i>Subject Item</i>			
<i>OS / Ref #</i>			

Make additional copies of this form if needed.

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**Section 5
Compliance Schedules**

Instructions

Complete this form if the permit included any compliance schedules (Section D of the permit) or if there are any non-compliance issues at the time of completing this application form. Check the appropriate box to indicate whether the compliance schedule has been updated, removed, or added.

Subject Item	Requirement	Compliance Schedule	Compliance Schedule		
			Updated	Removed	Added
<i>Subject Item</i>					
<i>OS / Ref #</i>					
<i>Subject Item</i>					
<i>OS / Ref #</i>					
<i>Subject Item</i>					
<i>OS / Ref #</i>					

Make additional copies of this form if needed.

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