



STATE OF NEW JERSEY  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



DIVISION OF AIR QUALITY  
AIR QUALITY, ENERGY, AND SUSTAINABILITY

PERMIT APPLICATIONS  
PRIOR TO 1998  
(PCP96'S AND 97'S)

February 1, 2019

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# Pre-NJEMs?

- Pre-NJEMs are permits approved before the existence of our NJEMs, New Jersey Environmental Management System (client-server application)
- Before 1998 (we called these permits PCP96's and PCP97's)

# Background

Before 1998, facilities completed pink and green forms to complete their permit applications

In 1998, NJEMS and Radius were released to allow for electronic submittal of applications

After 1998, the pre-NJEMS permits were created in the system with one piece of equipment and no compliance plan. An activity number was created for them (PCP 96's and 97's )

There were about 20K pre-NJEMS permits. Still have around 5k (~ 800 PCPs are expired)

In 2011, those paper permits were scanned and imported into NJEMS, under the existing activity number (PCP96's and 97's)

# What is the issue?

- These PCPs don't include a complete compliance plan and the renewal invoices are not correct.

Compliance Plan	Invoices
<ul style="list-style-type: none"><li>• Missing Permit Requirements!</li><li>• Missing list of all equipment</li></ul>	<ul style="list-style-type: none"><li>• Renewed invoice(s) created incorrectly for most of the permits based on incorrect listing of equipment.</li></ul>

Q: Were there really no changes in operation since 1997 for more than 5,000 permits?

# What is the Solution?

- INTERNAL ACTIONS

## NON-EXPIRED (Continually renewed)

- Correct the count on equipment list manually for each PCP96 & PCP97
- Adjust the equipment inventory accordingly (that will correct the future renewal invoice)
- However, this is not correcting the permit requirements! (The real issue!)

## EXPIRED

- Correct the count on equipment list manually for each PCP96 & PCP97
- Adjust the equipment inventory accordingly (that will correct the future renewal invoice)
- Refer to Enforcement for proper action!

# What is the Solution? (cont.)

- FACILITY ACTIONS

## FACILITIES WITH ACTIVE APPLICATIONS

- Permit writers will review PCP96's and 97's
- Will determine the correct number of pieces of equipment
- Will adjust the future renewal invoice
- Permit writers will contact facility if they qualify for a general permit (GP)

## FACILITIES WITH NO ACTIVE APPLICATIONS

- Facilities shall confirm if they did a modification to these permits to submit a new permit; PCP or GP
- Facilities are responsible to revise these PCPs or apply for an appropriate permit; if not Enforcement may take proper action
- During Enforcement inspections, they will confirm if the pieces of equipment permitted in PCP96's and 97's have not been modified

# Sub 8 State Implementation Plan (SIP)

- Subchapter 8 (N.J.A.C.7:27-8) has been incorporated into the State Implementation Plan which includes enforceable emission limitations or other control measures to attain the National Ambient Air Quality Standards (NAAQS)
- Each permit must have all applicable (State and Federal) requirements with appropriate reporting, monitoring, and recordkeeping requirements.

# FEES (FOR YOUR OWN REFERENCE)

## **Renewals**

- \$1267 – Renewal of permit
- \$338 – per each additional piece of equipment per permit
- Certificate to operate good for five years

## **General Permit Registration**

- \$820 including single or multiple pieces of equipment
- Certificate to operate good for five years



# ENFORCEMENT UPDATE

*Making You Aware of Incentives and Compliance Assistance Opportunities*

Compliance & Enforcement

Issued: DATE

#2018-??

## PCP-96 and PCP-97 Compliance Advisory

### Who is affected?

A regulated facility with sources permitted under PCP96 and/or PCP97. These activity numbers are known as Pre-NJEMs. Pre-NJEMs are permits approved before the existence of the Department's New Jersey Environmental Management System (NJEMS) (client-server application).

### What equipment or sources are affected?

All equipment or sources permitted under a PCP-96 and/or PCP-97.

### What is the issue?

These PCPs do not include all the applicable requirements and the renewal invoices are not correct.

### What is NJDEP doing?

Subchapter 8 (N.J.A.C.7:27-8) has been incorporated into the State Implementation Plan which includes enforceable emission limitations or other control measures to attain the National Ambient Air Quality Standards (NAAQS). Each permit must have all applicable (State and Federal) requirements with appropriate reporting, monitoring, and recordkeeping requirements.

The Department will be taking internal and external actions to resolve this issue.

#### Internal Actions:

- For each PCP-96 & PCP-97, the list of equipment in the permit(s) will be corrected.
- The renewal invoice will be revised accordingly, which will correct future renewal invoice.
- Facilities with expired PCP-96 and/or PCP-97 will be referred to Compliance & Enforcement for appropriate enforcement action.

#### Facility Actions:

- **Facilities with active applications:** The Permit writer will review any existing PCP-96's and PCP-97's to determine the correct number of pieces of equipment. The renewal invoice will

be adjusted accordingly and the Department will contact the facility if they qualify for a general permit (GP)

- **Facilities with no active applications:** If the permitted source(s) have been modified, facility shall submit a new permit (PCP or GP).

Facilities are responsible to revise these PCPs; if not Compliance & Enforcement will take appropriate enforcement action during inspection.

### Background

- Before 1998, facilities completed pink and green forms to complete their permit applications
- In 1998, NJEMS and Radius were released to allow for electronic submittal of applications
- After 1998, the pre-NJEMs permits were created in the system with one piece of equipment and no compliance plan. An activity number was created for them (PCP 96's and 97's)
- There were about 20K pre-NJEMs permits. The Department still have around 5K (~ 800 PCPs are expired)
- In 2011, those paper permits were scanned and imported into NJEMs, under the existing activity number (PCP96's and 97's)

### Who should I contact with questions?

Air Quality Permitting	609-292-6716
Air Compliance and Enforcement	973-656-4444 (Northern); 609-292-3187 (Central); 856-614-3601 (Southern)
Radius helpline	609-633-7259
General Permit Helpline	609-633-2829

### Where can I get more information?

The following web sites can be accessed for additional information regarding this advisory:

- Division of Air Quality Permitting Program website: <http://www.state.nj.us/dep/aqpp/>
- Compliance and Enforcement website: <http://www.nj.gov/dep/enforcement/>
- For general NJDEP information (Contact NJDEP): <http://www.nj.gov/cgi-bin/dep/contactdep.pl>
- To comment on this advisory: <http://www.nj.gov/dep/enforcement/survey.html>

Please note this advisory is intended to be a summary explanation of a department initiative. It does not include all potentially applicable requirements. If you have any questions related to compliance with this initiative, please contact the Enforcement number listed above.

# FACILITIES WITH ACTIVE PRECONSTRUCTION PERMITS ISSUED IN 1996 AND 1997

## PI Number: 00009 - STEPAN CO

STEPAN CO  
100 W HUNTER AVE  
Maywood, Maywood 07607

Non- DEP Contacts	
BOB PEACOCK	(201) 712-7644 xt
VP & GM	
JAMIL ALLEN	(201) 712-7232 xt
ENVIRON ENGINEER	

Activity Number	Activity Type Description	Document Status
PCP960001	Construction of New Source	Renewed
PCP960003	Construction of New Source	Renewed
PCP960005	Construction of New Source	Renewed
PCP960006	Construction of New Source	Renewed
PCP960011	Construction of New Source	Renewed
PCP960013	Construction of New Source	Renewed
PCP960017	Construction of New Source	Renewed
PCP960035	Construction of New Source	Renewed
PCP960036	Construction of New Source	Renewed
PCP960037	Construction of New Source	Renewed
PCP960038	Construction of New Source	Renewed
PCP960049	Construction of New Source	Renewed
PCP970001	Construction of New Source	Renewed
PCP970002	Construction of New Source	Renewed

## PI Number: 00066 - WESTMORELAND TREATMENT FACILITY

WESTMORELAND TREATMENT FACILITY  
11TH STREET  
Fair Lawn, Fair Lawn 07410

Non- DEP Contacts	
JIL SCHNEIDER	(201) 794-5300 xt

Activity Number	Activity Type Description	Document Status
PCP960001	Construction of New Source	Renewed

## PI Number: 00102 - TEC-CAST

TEC-CAST  
440 MEADOW LANE  
Carlstadt, Carlstadt 070726596

Non- DEP Contacts	

Activity Number	Activity Type Description	Document Status

# FACILITIES WITH ACTIVE PRECONSTRUCTION PERMITS ISSUED IN 1996 AND 1997

## PI Number: L8608 - 1 TOUCH CLEANERS

1 TOUCH CLEANERS  
6216 PARK AVE  
West New York, West New York 07093

Non- DEP Contacts	
OSCAR NUNEZ PRESIDENT	(201) 854-3214 xt

Activity Number	Activity Type Description	Document Status
PCP970001	Construction of New Source	Expired

## PI Number: L8809 - TOWNE SQUARE DRY CLEANERS

TOWNE SQUARE DRY CLEANERS  
876 UNION MILL RD  
Mount Laurel, Mount Laurel 08054

Non- DEP Contacts	
OWNER	(609) 222-0228 xt

Activity Number	Activity Type Description	Document Status
PCP970001	Construction of New Source	Expired

## PI Number: L8907 - PEOPLES CLEANERS

PEOPLES CLEANERS  
1031 KAIGHN AVE  
Camden, Camden 08103

Non- DEP Contacts	
CLARENCE PEOPLES OWNER	(609) 964-4161 xt

Activity Number	Activity Type Description	Document Status
PCP970001	Construction of New Source	Renewed Temporary

**Total Facilities    2151**

**Total Activities    4050**

# QUESTIONS



# HELPLINES

- General Permits (609) 633 - 2829
- Operating Permits (609) 633 - 8248
- Pre-Construction (609) 292 - 6716
- RADIUS (609) 633 - 8250