

INDUSTRIAL STAKEHOLDER GROUP MARCH 2, 2017 MEETING HIGHLIGHTS

Preliminary Matters

Introduction of Attendees

Agenda Items

I. Air Trends in New Jersey: At the December 1, 2017 ISG meeting, stakeholders indicated they would be interested in a presentation on ambient air quality monitoring trends in New Jersey. The Department presented the most recent trends for criteria air pollutants and air toxics. The presentation will be posted on the ISG website.

II. Regional Greenhouse Gas Initiative (RGGI): RGGI is a market-based program intended to reduce CO₂ emissions among participating states through a cap and trade program. New Jersey was an original member and participant. However, in 2011, New Jersey's participation was terminated and the existing regulations were either repealed or allowed to expire. On January 29, 2018, Governor Murphy issued Executive Order No. 7 directing the Department to rejoin RGGI and to begin the rulemaking process. A letter was sent from Governor Murphy to RGGI on February 16, 2018 indicating New Jersey's intent to rejoin RGGI. Currently, two parallel rulemaking processes have begun. The first is the mechanics rule, which will detail New Jersey's participation in the auction. The second is the funding rule, which will determine how the proceeds from the auction will be disbursed. A public information session will be held on March 29, 2018 to address both rules. Updates will be posted to the following website <http://www.state.nj.us/dep/aqes/rggi.html> as the rulemaking progresses.

III. RADIUS

RADIUS 5.0 was released on January 23, 2018. To date, users have reported a smooth transition with only one isolated issue being reported by a single user.

IMPORTANT NOTE: RADIUS 4.0 is obsolete. All submissions to the Department must be made through Radius 5.0. Like 4.0, RADIUS 5.0 must be installed on your computer (C: drive only). If users have questions or difficulties during installation, the RADIUS Hotline number is (609) 633-7259.

IV. Risk Analysis Flow Chart

Per requests from stakeholders, the Department prepared a flow chart demonstrating the risk screening worksheet that demonstrates the procedure to be followed if applicants are submitting modifications to Title V air permits or submitting an initial or renewal application. The flowchart is available on the ISG website. Applicants are urged to speak with their permit evaluators before submission if they need clarification on any point.

V. VOC Testing Engines

Recently, the Department sent a form letter to stationary source permit-holders with reciprocating engines combusting natural gas or fuels similar to natural gas. The letter provided notice that if the source's current permit did not include formaldehyde in the VOC allowable, a permit modification would need to be submitted. If formaldehyde is listed in a current permit and it has a pound per hour limit, the Department cautions permit-holders that certain testing must be performed to accurately measure the formaldehyde emissions. Specifically, method 25A will not register formaldehyde accurately and permit-holders are advised to research Method 323 in conjunction with Method 320. For those permit-holders who have a scheduled stack test, the Department suggests that they contact Enforcement with any concerns. Be advised that emergency generators do not have a pound per hour limit on formaldehyde. The presentation will be posted on the ISG website.

VI. Update on General Permits and General Operating Permits

The Department provided an update on general permits and general operating permits. The status of specific GPs/GOPs and dates can be found in the presentation posted on the ISG website which is available online. Of particular note: (1) the new GP-016A was made available on December 4, 2017 while GOP-002A is still in development; (2) GP-004B was made available on January 16, 2018 (Stage I GDFs) and GP-004(A) was made available on January 16, 2018 in paper form (existing GDFs equipped with Stage I and II). Several GPs and GOPs are under construction: (1) GP-013A doe non-HAP dry cleaning; (2) GP-009 and GOP-009 for boilers and heaters greater than 10 MMBTU/hr and less than 50 MMBTU/hr; (3) GP-015 for plating operations; GP-019A for temporary equipment; (4) GP-008A and GOP for Site Remediation Activities; (5) GP-007A and GOP-007 for Storage Tank(s) storing VOC(s).

VII. Rules / Technical Manuals / SOTA Manuals Update

Rules

- The adoption of the Legacy Landfill rule was published in the NJ Register on September 5, 2017 and became operative on October 7, 2017.
- The adoption of the CTG/NO_x RACT rule was published in the NJ Register on November 6, 2017 and became operative on November 6, 2017.
- The adoption of the PM_{2.5}/SSM (Startup/Shutdown/Malfunction) rule was published in the NJ Register on November 6, 2017 and became operative on December 9, 2017.
- The adoption of the Stage II decommissioning and TBAC repeal rule was published in the November 20, 2017 New Jersey Register and became operative on December 23, 2017. Phase I systems use new GP-004B and Phase II use existing permit GP-004A.
- The adoption of the Resiliency and Air Toxics rule was published in the January 16, 2018 New Jersey Register and became operative on February 12, 2018.

VIII. Emissions Statement Update

The Department reminds sources required to submit emissions statements that they are due on May 15, 2018 if they are submitted via paper form and June 15, 2018 if submitted through the portal. Kindly remember that all portal submissions must be made through Radius 5.0 (Radius 4.0 is no longer operative). Diskettes and email will no longer be accepted (USB drives are unacceptable as well). The

Department advised that PM_{2.5} and NH₃ must be reported at the source level and stack tests must be adjusted to include all VOCs, including formaldehyde. For those who may have questions, the Department has streamlined and updated its guidance document for emissions statement preparation. This document may be found online.

VIII. Billing

The Department began revising the format of its bills approximately one month ago. Permit applicants are reminded that if you submit a revised application, a second bill will be generated. To avoid confusion or duplicate billing, please consult with your permit reviewer concerning all corrections or revisions. If you wish to pay an invoice with an intra-government voucher, you must first call the Department to advise them of the payment option to ensure the funds are applied to the correct invoice. Please refer to the presentation posted on the ISG website for details on bill status and on how to pay a bill.

IX. Closing: ISG members were advised that the Department is reviewing changes in federal policy and procedures, including analysis of the new interpretation of “once in always in” memorandum. The Department will make its position publicly available once the Departments completes their review. ISG members were reminded to submit any suggested topics at future meetings via the website prior to the meeting so Department staff could be prepared with answers.

All written presentations were posted on the ISG Meeting webpage.

<http://www.state.nj.us/dep/aqpp/isg.html>