

## INDUSTRIAL STAKEHOLDER GROUP (ISG)

### MARCH 6, 2015 MEETING HIGHLIGHTS

1. An update was given by the Air Quality Planning Program. The Department's new outreach campaign, "CleanAirNJ", has been rolled out and the website can be accessed at [www.cleanair.nj.gov](http://www.cleanair.nj.gov).

The USEPA is has proposed to modify the 8 hour ozone primary and secondary standards. The secondary standard is being proposed as equivalent to the primary, or as a weighted average (called a W126), in the form of parts per million per hour. The proposal can be found at [http://www.epa.gov/ttn/naaqs/standards/ozone/s\\_o3\\_index.html](http://www.epa.gov/ttn/naaqs/standards/ozone/s_o3_index.html).

The court decision that revised the 75 ppb ozone attainment deadline from December 31, 2015 to July 20, 2015, to be consistent with the Clean Air Act requirements, will result in ambient ozone attainment being determined based on the average of ozone seasons from 2012-2014 instead of 2013-2015. The state's northern ozone nonattainment area will not meet attainment, but the southern nonattainment area is eligible for a one-year extension of the attainment deadline.

The USEPA completed a national transport modeling assessment to address the impact of air contaminant emissions from neighboring states. This assessment can be found at <http://www.epa.gov/airtransport/ozonetransportNAAQS.html>.

ISG members were requested to contact any of their company's facilities which are upwind from New Jersey to urge them to operate their nitrogen oxide(s) control devices during the summer months when ozone levels are highest. Certain averaging plans would allow these controls to be taken off-line.

2. The Department's 2/27/15 draft memorandum "Allowable Emergency Generator Operations for Critical Facility Functions" was discussed. The Department stated that emergency generators could be operated during a scheduled repair of critical infrastructure and that any operation would be counted towards the generator's testing and maintenance hours. A question was asked if a facility could proceed with a scheduled repair which coincided with a bad air quality day when the emergency generator is not permitted to operate for testing and maintenance. The Department strongly recommends that these types of repairs should be scheduled outside of ozone season, when there is a decreased chance of a bad air quality day.

The Department stated that it would compare its current testing and maintenance emergency generator policy with that in 40 CFR Part 63 Subpart ZZZZ and would examine other policies concerning generator operation, such as the memo on Construction, Repair, and Maintenance, with those stated in the draft 2/27/15 memorandum.

3. An update was given on administrative issues. The Department described how facilities could access their outstanding invoices by inputting their facility (PI) number. This provides a list of the invoices and associated PCP or BOP Numbers. However, only the PCP/BOP Number is shown, and not the equipment covered by the PCP/BOP.

A Permit can be cancelled by using the termination form from Air C&E, which is available at Air C&E website. Click on this link, <http://www.nj.gov/dep/enforcement/air-resources.html>, and scroll down to the bullet item “Air Permit Termination Request Form for Non-Title V Permit.”

The Department stated that a facility contact could be changed on-line through Masterfile and can be done at minimal cost with a non-technical amendment. In addition, it can be done with no cost when a permit application is pending.

The following items will be addressed by the Department:

- a. At the June ISG meeting, the Department will present how to generate reports on-line which will show all of a facility’s current activities.
  - b. The SRO has a permit termination form for PCPs which will be reviewed to determine if it could be used on a state-wide basis.
  - c. A representative from OIRM will be invited to the next ISG meeting. Stakeholders were advised to provide input on initiatives which the Department can implement which would make their facilities more efficient. These would include giving facilities access to all PDFs of pre-1996 permits scanned into NJEMS.
4. It was announced that the participants for the industrial and environmental stakeholder groups for the upcoming transformation meetings have been chosen and that these names will be posted. Anyone can submit comments for consideration at the meetings and the comments can be on any topic, including proposed rule changes.
  5. The new fee rule has been promulgated and the Department provided the web sites to access the amended fee schedule and response to comment document. The effective date

for the new fees is February 27, 2015. Although renewals are on the new fee schedule, the renewal notices generated prior to 2/27/15 will show the prior renewal fee, even though the renewal date is after 2/27/15.

6. The Department stated that CAIR is being replaced by CSAPR and that CSAPR language will be included when Operating Permits are renewed or modified. There are not many NJ facilities that will be impacted by the CSAPR rules. Nitrogen oxide(s) CAIR allowances are not usable under CSAPR.
7. A demonstration of a draft “Cancer Risk Screening Worksheet for Non-road Diesel Engines” was given. The Worksheet determines the incremental cancer risk from the operation of diesel engines. The Department stated that the Worksheet was undergoing beta testing and asked for volunteers to use the Worksheet and provide comments. One comment received is that the Worksheet minimum stack heights of 15 feet and 25 feet may be too low for many engines.
8. An update was provided on General Permits/General Operating Permits (GP/GOP). The revised GP for storage silos is scheduled to be available May 4, 2015. This will allow multiple silos to be covered by a single GP. The electronic version of the natural gas emergency generator GP/GOP is being developed and testing is scheduled to begin the end of April.
9. The Electronic Reporting Tool (ERT) is being successfully used for stack testing and its use is being included as a requirement in new, renewed, and modified Preconstruction Permits and Operating Permits. ERT standardizes the stack test submissions and improves the review efficiency as a result of the standardization.

ERT protocols and reports are submitted to BTS on CDs. A voluntary alternative method to submit ERT test reports (but not protocols) to BTS is electronically through EPA’s Central Data Exchange (CDX.) ERT reports submitted through the CDX are publicly available on-line and can be used to determine BACT/RACT/LAER/SOTA levels and emission factors. EPA is currently developing a tool where users can develop their own emission factors from user-selected stack test reports that have been submitted through the CDX.

Waiver to use of the ERT can be granted, if justified.

10. Emission Statements must be submitted by May 15 or by June 15 if the portal is used. The Emission Statements unit is being transferred from the Air Quality Planning Program to the Air Quality Permitting Program.

11. The Department stated that it will post the following in response to input from ISG attendees: the email address to use to forward questions on the portal; Division of Air Quality organization charts, and all of the listservs which concern air quality issues.