

**INDUSTRIAL STAKEHOLDER GROUP (ISG)  
MARCH 8, 2013 MEETING HIGHLIGHTS**

1. An update was given by the Air Quality Planning Program.

The final PM<sub>2.5</sub> redesignation submittal was sent to the USEPA on December 26, 2012. The Department anticipates that the USEPA will issue a decision on the redesignation this summer.

On March 6, 2013, the Department submitted a request for the termination of the Section 185 fees for the 1 hour ozone National Ambient Air Quality Standard. This request is for the New Jersey portion of the Northern New Jersey-New York-Connecticut nonattainment area only (USEPA had determined that the Southern New Jersey-Philadelphia-Delaware-Maryland area had attained by the attainment date so was not subject to the Section 185 fee provision). The northern area has been in attainment since 2010.

In order to submit Emission Statements through the NJDEP Online Business Portal, a full upgrade to RADIUS 4.0.09 must be made. Mike Santilli should be contacted if there are any emission statement questions on using the NJ Portal.

2. After completing the beta testing, Air Quality Permitting Program (AQPP) has started a pilot test of the electronic Netting Analysis Tool (eNAT) with seven facilities and two consulting firms. eNAT will be used to create, submit, approve, and manage netting analysis submissions required under N.J.A.C 7:27-18. The Department is planning to train the permitting staff in the use of eNAT prior to release. At that time, the Department will also consider holding an online webinar for the applicants.

The beta version of the tool and the instruction manual are available for download on AQPP's webpage at: <http://www.nj.gov/dep/aqpp/enat.html>.

3. As of January 15, 2013, NJDEP's online portal accepted submittal of RADIUS permit applications and emission statements via DEP Online (<http://www.nj.gov/dep/online>). Certification and payment of fees associated with the submittal of most applications can also be done online via this system. So far, over 100 applications have been received on-line. Applicants are encouraged to provide feedback and contact the Bureau of Air Permits, Customer Service Representatives, at 609-633-2829 if any issues are encountered.
4. The AQPP has posted a new document on its webpage that provides the implementation status of various suggestions received during the Department initiated stakeholder process undertaken by the AQPP, a joint AQPP and Compliance &

Enforcement stakeholder meeting, and AQPP's quarterly Industrial Stakeholder Group (ISG) meetings. The list is grouped by implementation status: Implementation Completed, Under Consideration, and Projects in Progress.

Document link:

<http://www.nj.gov/dep/aqpp/downloads/isg/AQPPImplementationPlan.pdf>

5. The Department agrees with the suggestion that incorporation by reference (IBR) in permits may be appropriate and useful under some circumstances. Applicants may propose compliance plans that incorporate Federal rules by reference where there are not compliance options that would need to be identified in the permit.
6. The Department is giving a high priority to reducing the backlog of pending Title V/Operating Permit renewals. Applicants will be asked to provide comments on draft renewal documents within two weeks as a means of increasing the issuance of renewals. Please advise if a longer time period is needed.
7. Specific issues concerning compliance plans were discussed. Facilities were advised to contact their permit writer for this type of issue and contact the writer's supervisor, as needed.
8. A stack test program update was given.

USEPA is working on a PM<sub>2.5</sub> test method for wet stacks involving an inertial droplet separator, which may be issued for general use by the end of 2013.

Two Accredited Audit Sample Providers (AASPs) have now been approved. Sixty (60) days after USEPA posts details about the second provider on the USEPA Emission Measurement Center website, quality assurance audits will be required to be purchased for all stack tests using any affected test method(s).

Several Federal regulations now require the Emissions Reporting Tool (ERT) to be used. ERT use in NJ has been voluntary, except where required by Federal regulations. Eventually, the ERT will be required for the all stack emissions testing in NJ.

The Technical Manuals for Stack Testing (TM 1004) and Continuous Emission Monitoring (TM 1005) will be updated later this year. One of the revisions will be the inclusion of the ERT. Stakeholders will be contacted for input on the proposed changes to TM 1004 and TM 1005.

9. Facilities were advised to sign up for DAQ Listserv announcements which deal with rule revisions, outreach sessions, permit guidance, emission statements, and state implementation plans. The DAQ Listserv web page can accessed at <http://www.state.nj.us/dep/aqpp/listserv.html>.
  
10. A General Permit update was given. GP-09A for Boilers between 10-50 million BTU per hour replaced GP-9 and was made available in February, 2013. GP-4 for fuel dispensing operations (gas stations) will be replaced with an updated GP-4A and will be made available in May, 2013.  
  
An Emergency Generator General Operating Permit will be available around July 1<sup>st</sup>. The Draft GOP already incorporates EPA comments. Its implementation will allow major facilities to permit diesel powered Emergency Generators subject to 40 CFR Part 63, Subpart IIII without having to file a significant modification.
  
11. Only operating time for testing and maintenance should be used when determining PTE for Emergency Generators. If an Emergency Generator's permitted PTE is not consistent with this, a modification to the permit may be filed to reduce the PTE.
  
13. The next ISG meeting will be held on June 7, 2013. At the 6/7/13 meeting, updates will be provided on the procedure used to determine if an EG can be operated on a given day for testing and maintenance and how invoices for air permitting fees can be obtained.