DIVISION OF AIR QUALITY
AIR QUALITY, ENERGY, AND SUSTAINABILITY

PROCEDURE FOR RISK ASSESSMENT

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SECOND LEVEL RISK ASSESSMENT

• Second level risk assessment procedure for minor source facilities with an initial application or a modification
• The scope does not include the procedure for facility wide risk assessment
• The scope does not include the risk assessment procedure for major facilities
FIRST STEPS WHEN AN APPLICATION IS RECEIVED

• Before an application can be assessed for risk, the application must be deemed administratively and technically complete.

• Administrative completeness consists of:
  • Responsible Official certification as defined by N.J.A.C. 7:27-1.4 and compliant with 7:27-1.39
  • Correct contacts for the Air Permit Information Contact, Fee and Billing Contact, and the Responsible Official
  • A complete RADIUS file

• Technical completeness consists of:
  • Verifiable emission calculations and their corresponding rates correctly filled out on the Potential to Emit tables
  • Equipment and or facility specific supporting information as needed
  • Demonstrated compliance with all State and Federal regulations, and/or SOTA, if applicable
If the application is emitting a new HAP, increasing the emissions of an existing HAP, or changing stack parameters in a manner that may increase risk, then risk must be assessed using the primary level risk screening worksheet.
The primary level risk assessment worksheet may only be used for the piece of equipment if:

- The emission point is a point source;
- The discharge direction is upwards; and
- The stack height is 15 feet or higher

Emission rates are entered for both hourly and annual rates for each individual HAP, along with the stack height and distance to property line.

If the primary level risk assessment worksheet results in a Further Evaluation Required (FER) determination or if the worksheet cannot be used for the above-mentioned reasons, then second level risk assessment must be performed.
BEGINNING SECOND LEVEL RISK ASSESSMENT

• During the first level assessment, the permit evaluator and the applicant should make all attempts to minimize the risk, including adjustments of stack height and distance to the property line.

• If risk minimization is not successful and the primary level risk assessment worksheet indicates that further evaluation is required for one or more compounds, the facility has two options:
  • The facility may request that the Bureau of Evaluation and Planning conduct the modeling exercise by submitting a detailed facility plot plan or site survey.
  • The facility may conduct the modeling exercise themselves by submitting a modeling protocol prepared in accordance with Technical Manuals 1002 and 1003.

• All requested information should be supplied before second level risk assessment is initiated.
DEPARTMENT PROCEDURE

- The permit writer will draft a memo that requests a secondary level risk assessment from the Bureau of Evaluation and Planning.
- The memo is sent by the permitting Section Chief to the Bureau of Evaluation and Planning.
- The application is assigned to a member of the modeling staff for review.
- Any other information may be requested if there are questions or comments from the modeling staff.
  - Some comments may require revisions to the permit application.
Either the facility or the Department will compile a summary of the modeling results that state the predicted health impacts of the new or modified equipment.

Steps for addressing significant risks will be discussed in a following presentation.

Risk levels considered non-negligible will be referred to a joint Risk Management Committee to discuss if the permit is acceptable or if risk minimization procedures are required.

Based on the Risk Management Committee’s final recommendations, the Bureau of Evaluation and Planning will either:

- Issue an internal memorandum indicating that there is no further review of the potential health risk needed; or
- Issue a final decision that the potential health risk results in a contravention of criteria established by the Department to protect human health, welfare, and the environment and the Department will begin to work with the facility to minimize impacts.
QUESTIONS