ISG GP/GOP UPDATE

June 5, 2020

Mike Adhanom, Section Chief, Division of Air Quality
NEW GENERAL PERMIT

• **GP-019A** – Temporary Equipment
  • To simplify and incorporate State Rule Changes (N.J.A.C.7:27-8).
  • To limit the GP for one year
  • The operation will be based on SOTA limitation
  • This GP replaced GP-019
  • More than one GP-019A is allowed per facility
  • GP available since April 6th
DISCONTINUATION OF GPs AND GOPs

Discontinuation of the following GPs and GOPs were effective on April 6\textsuperscript{th}:

- GP-021/GOP-005 Combined Heat and Power (CHP) Combustion Turbine(s); AND
- GP-022/GOP-006 CHP Spark Ignition Reciprocating Engines
- The Department is considering to review these GPs and GOPs at a future date
GPs AND GOPs UNDER CONSTRUCTION

- **GOP-009** - Boiler greater than or equal to 10 MMBTU/hr and less than 50 MMBTU/hr;
  - GOP working on the Response to comments document.
  - Requirements similar to GP-009B
  - GOP-009 tentative date TBD
GPs AND GOPs UNDER CONSTRUCTION

• GP-020 – Research and Development

• R-001 – Registration form for Used Oil Space Heaters

• GP-008 – Site Remediation Activities for Gasoline Contamination at Vehicle Fueling Stations (SVE)

• CHPs for Spark Ignition Reciprocating Engines and Combustion Turbines
UPDATES ON NEW FEATURES IN GPs
NEW WINDOW AT THE TIME OF REGISTRATION

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| Responsible Official: | TEST RESPONSIBLE OFFICIAL |
| | TEST TITLE 3 |
| | NJDEP |

| Mailing Address: | 401 E State St - 6th Flr - West Wing |
| | Trenton, NJ 08625 |
| Responsible Official: | This is not Art Lehberger. |

| Mailing Address: | 720 Washington Ave |
| | Carlstadt, NJ 07072 |

If the information above is correct and complete, please click on the "Confirm" button. Otherwise click on the "Incorrect/Edit" button to modify information or to provide more information.
• Applicants should confirm the following information at the time of registration:

  • Name and Address of facility
  • Responsible Official contact information: Name, email and mailing address:
  • If any of the information is not correct, a non-technical amendment should be completed. This form is located at our AQPP website under “Applications and Forms”: https://www.state.nj.us/dep/aqpp/applying.html
  • Applicant should wait for a confirmation from the Department of the change in Masterfile before attempting a new General Permit application.
To correct, modify or add facility information, a Non-Technical Amendment must be submitted to the Department.

Please click on the following link to view the Non-Technical Amendment form: https://www.state.nj.us/dep/agpp/downloads/Nontech.doc

For instructions on how to complete the Non-Technical Amendment, please click on the following link: https://www.state.nj.us/dep/agpp/downloads/forms/Non-Tech%20Instructions.pdf

Please note that it may take 5 business days to process a Non-Technical Amendment.

After submitting the non-technical amendment form, please wait for a confirmation from the Department before attempting a new General Permit application.
QUESTIONS/CONCERNS FROM THE PUBLIC RELATED TO GPs AND GOPs
About GP-004B for Fuel Dispensing Facilities equipped with Phase I

Question:

Why GP-004B permits for Fuel Dispensing Facility Equipped with a Phase I Vapor Recovery Control System requires to enter the fuel usage limit in the registration, however the GP issued to the facility does not include that fuel limit?
About GP-004B for Fuel Dispensing Facilities equipped with Phase I

Answer:
1. The GP-004B registration is completed including the facility’s maximum gasoline throughput.
2. The information entered in the registration is migrated in NJEMs.
3. The submittal information is created as a PDF document saved in NJEMs and send to facility by email.
4. Once the GP is paid, a PDF approval document is created.
5. In the Approval document, the throughout is not specified. However, the following language is included in the permit requirement; “The annual throughput shall not exceed the gallons of gasoline per consecutive 12-month period year specified by the Permittee in the online registration.”
6. Both, the PDF approval and the PDF Submittal (the information entered in the registration) are found in the DataMiner.
Question:

GP-019 for portable equipment (i.e., woodchippers, compost screeners). Most of the time the equipment comes in Horsepower (HP) and there is no easy way to calculate or identify how that piece of equipment can be evaluated in terms of MMBTU/hr. If the NJDEP has a reference guide for evaluating this equipment, it would be fantastic.
New GP-019A for Temporary Equipment

Answer:

1. GP-019 has been replaced by GP-019A
2. The new GP-019A for temporary equipment is using kilowatts (kW) instead of HP.
3. The calculation from Horsepower to kW can be performed using the following conversion: 746 kW is equal to 1000 HP.
4. New GP-019A automatically calculates the capacity from kW to MMBTU per hour.
About GP-005A and GP-005B for Emergency Generators

Question:

Why the Department is using AP-42 Emission Factors for GP-005A and GP-005B when calculating the PTE for the online registration?
About GP-005A and GP-005B for Emergency Generators

Answer: Main reason to use AP-42:

- GP-005A and GP-005B accept multiple sources (existing and new ones) in the same permit. The online design will be very complicated to have different emission factors.

- PTE emissions are based on hours of testing and maintenance (less than 100 hrs/year); therefore the emissions are not highly significant.

- GPs and GOPs are not meant to cover all scenarios. If a facility would like to have a PTE less than what is established in the GP, facilities can come case by case.

Note: Each engine subject to NSPS Subpart IIII or JJJJ should meet the emissions limits established in the federal regulation. The AP-42 emission factors are more for PTE calculation purpose.
HELPLINES

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