

**INDUSTRIAL STATEHOLDER GROUP (ISG)
JUNE 7, 2013 MEETING HIGHLIGHTS**

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

The USEPA is expected to propose redesignation to attainment for the entire state for both the annual and the 24-hour PM_{2.5} National Ambient Air Quality Standard. (Note: a redesignation proposal appeared in the Federal Register on June 27, 2013).

The Department's Section 185 Fee cancellation request was submitted to the United States Environmental Protection Agency (EPA) in March, 2013. The USEPA has not acted on this request. It should be noted that the USEPA has been sued on a Section 185 fee alternative program that it approved in California.

Over 400 Emission Statements have been received with approximately 60% of these submitted through the NJ Portal. Major issues that have arisen have been the use of an incorrect version of RADIUS, the use of an incorrect installation/upgrade of RADIUS, the deletion of the NOVA PDF printer, and now allowing completion of the PDS creation process in RADIUS.

2. Air Quality Permitting Program (AQPP) has completed the pilot test of the electronic Netting Analysis Tool (eNAT) with seven facilities and two consulting firms eNAT can 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 AQPP staff in the use of eNAT.

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. The rule language and basis and background documents to incorporate PM_{2.5} (fine particulates) into the state's air pollution control regulations are currently undergoing review by the Department's Office of Legal Affairs. The rule language is consistent with 40 Code of Federal Regulations, Part 51, Appendix S. The significant changes to the existing rules were outlined. It is anticipated that a formal rule proposal will be published sometime in the third quarter of 2013.
4. A question was raised on how the "PM_{2.5} net air quality benefit" would be determined for compliance with the Emissions Offset Rule (N.J.A.C. 7:27-18). The Department responded that this would have to be done on a regional, and not facility specific, basis. The updated rule will state that the nitrogen oxide(s) and sulfur dioxide are precursors to the formation of PM_{2.5}. However, no explicit offset ratios for these precursors will be listed. Instead, the Department will rely on ratios generated by case-by-case analyses or Regional Air Quality Associations that have been reviewed and approved by the Department and EPA.
5. A modification has been made for determining if an emergency generator can be operated for testing and maintenance. N.J.A.C. 7:27-19.2(d)2, states that such operation should not occur on days when the air quality forecast is unhealthy. Previously, a facility could check the forecast either after 5:00 p.m. the day before or the day of the scheduled testing and

maintenance. The revised protocol now relies solely on the forecast after 4:00 p.m. on the day before the scheduled testing and maintenance. A facility still has the option of checking the forecast the day of the scheduled operation, as long as it was the forecast in effect the prior day after 4:00 p.m. The document, "Is the Air Clean Enough to Operate Emergency Generator" is available which outlines a step-by-step procedure to begin receiving forecasts by email.

6. The procedure for paying invoices on-line was described. If an invoice was lost, it can be retrieved on "MyNJONLINE" by entering an air program interest number. Payment can either be made by credit card or electronic check. The Department acknowledged that public entities and facilities may not have the ability to pay an invoice on-line. In this case, the Regional Enforcement Office should be contacted and a PDF of the invoice can be forwarded.

7. Updated General Permits GP-4A "Fuel Dispensing Facilities" and GP-9A "Boiler(s) and Indirect Fired Process Heater(s) Each Greater Than or Equal to 10 MMBTU/hr and Less Than 50 MMBTU/hr Combusting Gaseous Fuel" are now available on-line. Notifications to existing holders of the revisions to these two General Permits have been distributed. GP-1 "Bulk Solid Material Receiving and Storage Systems" is in the process of being modified to allow multiple storage silos to be covered by one GP.

Current GPs for internal combustion engines are being updated to address New Source Performance Standards provisions, except for the provisions allowing emergency generators (EG) to operate under demand response conditions.

The General Operating Permit (GOP) for EG will be available on August 5, 2013. A Notice of Availability of this GOP will be posted in the August 5 New Jersey Register. The GOP has no limit on emergency operation and only has an operating limit on testing and maintenance. Consequently, emissions during actual emergencies no longer have to be incorporated into a facility's potential to emit. The EG GOP will save the Department and the regulated community resources since a major facility currently has a file to signification modification to incorporate an EG into its operating permit. With the GOP, the process is equivalent to filing a registration form with the Department. Both the registration and GOP are available on the AQPP website.

8. Stationary Source Audit Samples (SSAS) for stack tests are now available for metal and select inorganics methods and must be purchased by facilities for stack tests conducted on or after June 16, 2013. EPA regulations require the purchase of SSAS once two Accredited Providers have been available for at least 60 days. Additional methods may require the purchase of SSAS in the future if two or more Providers become available. All recently submitted stack test protocols that are being reviewed or have been approved have addressed the revised procedures to obtain SSAS to quality assure the stack test program.

9. The Air Quality Permitting Program's "Implementation Plan for Air Program Improvement" places initiatives into the following categories: 1) Implementation Completed; 2) Under Consideration; and 3) Projects in Progress. This can be accessed at the AQPP web page. Two

of the projects are the development of additional State of the Art Manuals, including a comprehensive manual for landfills, and expanding the number of GP and GOP.

Requests were made to evaluate the following three topics as a means of reducing the complexity of compliance plans: 1) incorporation by reference (IBR); 2) elimination of redundant requirements; and 3) elimination of conditions requiring process monitoring that are unrelated to the type and amount of air contaminants emitted.

10. Facilities that need to bring in an EG from off-site after during a power failure should first try to obtain a GP. However, if power is needed and a permit cannot be obtained in a timely manner, a facility should call its regional enforcement office and request enforcement discretion.
11. The next ISG meeting will be held on September 6, 2013.