

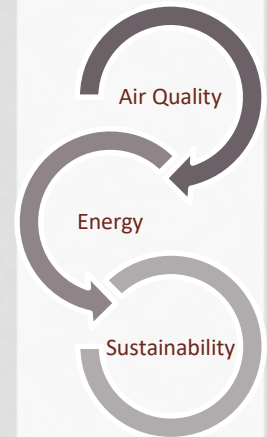


STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION



DIVISION OF AIR QUALITY AIR QUALITY, ENERGY, AND SUSTAINABILITY

SUFFICIENT MONITORING IN TITLE V AIR PERMITS



AUTHORITY

- Federal
 - 40 CFR 70.6(B)
- State of New Jersey
 - N.J.A.C. 7:27-22.9(c)(2)(ii)
 - N.J.A.C. 7:27-22.16(o)

COMPLIANCE DEMONSTRATION

1. Monitoring/Recordkeeping Sufficient to Demonstrate Compliance With Applicable Requirement
2. Choice of Monitoring Method and Frequency of Monitoring Decided on Case-by-case Basis

MONITORING METHODS FOR EMISSION LIMITS

1. Continuous Emissions Monitoring (CEMs/COMs)
2. Stack Emission Testing
3. Periodic Emissions Monitoring (PMPs)
4. Calculations
5. Surrogate Monitoring
 - a. Surrogate Emissions
 - b. Surrogate Operating Parameters

MONITORING METHODS FOR OTHER LIMITS

- Appropriate Monitoring/Recordkeeping for All Relevant Parameters
 - Continuous
 - Periodic
- Physical Parameters (Recordkeeping)
 - Tank Capacity
 - Maximum Heat Input
- Operating Parameters
 - Hours of Operation
 - Temperature

TYPE & FREQUENCY OF MONITORING

CASE-BY-CASE BASIS

1. Consistent with Rule/Guidance
2. Accuracy of Emissions Calculations
3. Facility/Project Emissions Thresholds
4. Facility Location
5. Public Interest
6. Public Health Risk
7. Enforcement History

PREDICTABILITY & OPERATIONAL FLEXIBILITY

- Testing & Monitoring Guidance
 - Pre-approved by USEPA
 - Deviations Acceptable With Appropriate Justification
 - Deviations Subject To USEPA Approval
- Proposed By Applicant
 - Preferred Monitoring Method
 - Already Used For Operational Purposes
 - Subject To NJDEP Approval

AIR PERMIT STAKEHOLDERS

- Applicant
- Public
- Environmental Organizations
- USEPA
- Surrounding States
- NJDEP – Permitting & Enforcement