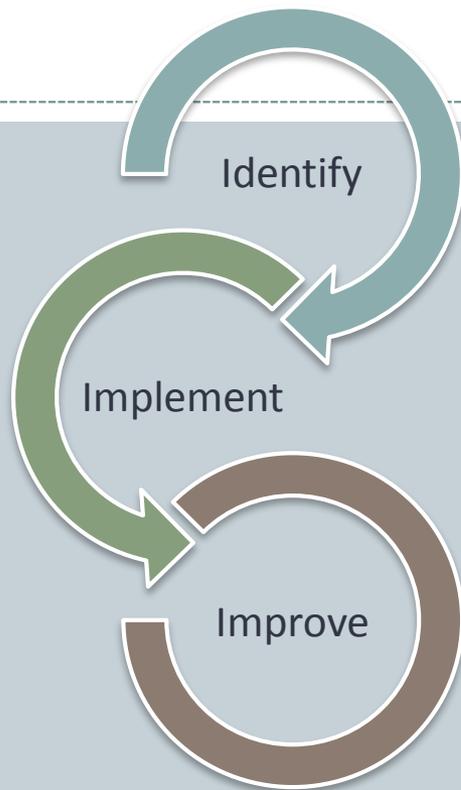


OPERATING PERMIT STREAMLINING

Workgroup Findings and Recommendations

New Jersey Department of Environmental Protection
Division of Air Quality, Bureau of Air Permits
401 E State Street, Trenton, NJ 08625



Air Quality Permitting Program
Air Permitting / Industrial Stakeholders Meeting
Dec 6, 2013

Introduction/Background



- The Air Quality Permitting Program (AQPP) initiated a stakeholder process as requested during the ISG meeting of June 7, 2013.
- ISG and AQPP selected three topics for the workgroup ([team?](#)):
 1. Incorporation of Federal Rules in Compliance Plans
 2. Streamlining of multiple applicable requirements
 3. Use of process monitors when CEMs are present
- During the three meetings (9/13, 10/24, 11/25):
 - Participants reviewed an actual compliance plan volunteered by a facility
 - Suggested process improvements and discussed AQPP's best practices
 - Discussed options and recommendations ([check details](#))

Incorporation of Federal Rules



- **Issue** - How to balance the benefits achieved through use of incorporation by reference with the need to issue comprehensive, unambiguous permits useful to all affected parties, including industry, public, and those engaged in field inspections and enforcement.
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- **Recommendations** - The workgroup reviewed a facility's permit and concluded that:
 1. Incorporation should be detailed enough that the referenced material is clear and not subject to misinterpretation.
 2. The compliance plan should specify the relevant section of the Federal rule, where only a portion of the referenced rule applies.
 3. Use "Groups" to consolidate common Federal requirements (NSPS, MACT, etc.) for multiple Emission Units.

Streamlining of Multiple Requirements



- **Issue** - How to use streamlining to consolidate several applicable requirements (with multiple standards) into one.
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- **Recommendations** - Continue to allow streamlining multiple applicable requirements when proposed by the applicant, consistent with the following:
 1. The new permit condition assures compliance with all subsumed requirements.
 2. The permit contains sufficient monitoring.
 3. The recordkeeping and reporting methods are consistent with the chosen monitoring.
 4. The statement of basis (public record) contains a comparison of requirements and justification for the decision.

Use of Process Monitors when CEMs are Present



- **Issue** – Are process and parametric monitoring necessary to ensure proper functioning of control devices and to ascertain continued compliance even when CEMS are installed?
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- **Recommendations** - The Department's permitting procedures should require parametric limits that are necessary to assure compliance.
 1. The Department will evaluate the parametric limits provided by the applicants during the technical review and share the drafts with applicant.
 2. The applicants will carefully review the proposed monitoring and recordkeeping methods and suggest alternates when appropriate.

Conclusion and Next Steps



- The best and proven practice is the **COLLABORATIVE APPROACH** between permit writer and facility's technical staff.
- The three permit streamlining measures, discussed above, are **UNIVERSALLY AVAILABLE** to all applicants.
- AQPP will continue to implement these measures working with applicants based on **FACILITY'S OPERATIONAL NEEDS** and **TIME CONSTRAINTS**.
- Site visits should be an integral part of the permitting process. The Department will encourage **MORE SITE VISITS**.
- Pre-application meetings greatly help clarifying the technical issues, understanding the expectations, and **BUILDING MUTUAL TRUST**.

OPERATING PERMIT STREAMLINING

NJDEP and ISG Workgroup Members



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