

## Air Workgroup Meeting Summary March 23, 2015

### **1. Emission Based Permitting Thresholds**

- All Sources
- Remove 50lbs/hr trigger AND/OR
- Add something to 8.2 “notwithstanding the above” statement for low emissions

### **2. Biosolids w/Particulate Limits**

- (Sub 6) on Equipment w/Deminims Emissions
- Related Issue

### **3. Monitoring/Recordkeeping/Reporting (MMR) → None**

- Why have a permit requirement if there is no associated MMR?

### **4. Modify Sub 18 is potential to potential applicability determination**

- Potential to Potential Applicability Option to be more like Federal NNSR App.
- 2 Part Test like PSD would be more appropriate
- SOTA Review is still Backstop

### **5. Reporting Thresholds in other Rules in Sub 19, Sub 17, 16.6, 16.7, and 16.16 (lb./hr.)**

- E.g. Coating Limits + Annual Limit
- Even if a short term limit is triggered, sub chapter should not apply if operation is limited in hours or TPY or other similar parameter which would otherwise make control seem unreasonable.

### **6. Portable Equipment**

- Multiple Permits for some Equipment - discussion may have uncovered duplicative permits not really required.
- Generators “Carb Registration”
- Suggested Sticker Program similar to CARB program – register ALL generators

### **7. Portable Equipment + Applicable Regulations**

- E.g. NOx RACT (Boilers)
- Is this covered in the Construction/Repair/Maintenance Guidance?
- Do General Provisions in Title V permit allow for this?

### **8. Replacement of Equipment on Emergency Basis (not just EGUs)**

- Temporarily Housed Equipment
- Rent a Boiler – only there until replacement boiler installed
- Do General Provisions in Title V permit allow for this?

### **9. Electronic Payment for Permits Prior to Permit Approval**

- e.g. Issue for Public Sector & Corporations (Bureaucracy)
- Cannot obtain GP/GOP until paid for

#### **10. Procedure/Policy vs. Rule**

- For Temporary Equipment/CRM
- Referenced Memo's vs. Facility Letters
- Turbine Swaps
- Make Rule Determinations Available – Website – Searchable database – Applicability Determination Index
- For all of the above items, the group agreed there is a balancing act between consistency/flexibility and predictability/flexibility. If the Department were to codify many of the policies, it was agreed some degree of flexibility would be lost in the vein of consistency and predictability.

#### **11. Definitions should be added to subchapters for the following equipment types:**

- Portable Equipment
- Emergency Generators
- Temporary Equipment
- Construction Equipment
- What requirements would be placed on these types of equipment? Temporary by Nature?

#### **12. Concurrent Public Comment and EPA Review for Title V Permits**

- 30 Day + EPA 45 Day
- Other States/Regions do it (Why Not in NJ?)

#### **13. For non-Bad Air Days**

- Allow Demand Response
- Other States upwind allow for this, why penalize NJ facilities?

#### **14. Renewable Energy Sources**

- Out of state sources should meet NJ Environmental standards for Class I similar to how Class II RECs qualify
- OR
- Modified RACT Limits
  - Different from Commercial Limits
  - Compliance Similar to NSPS Limits
- Monitoring Frequency Issues

#### **15. Implementation of Second Round of Transformation Initiatives**

- Promoting Mutual Trust between Applicant and Permit Evaluator
- Mechanism or Procedure to Identify Permit Review Impasses Earlier and Initiate Common Sense Approaches to Resolve Impasses

- Distinguish between Technical Issues & Personality Issues

#### 16. Monitoring Frequency

- Reduce stack test frequency for Low Utilization Equipment
- Stack Test at Variable Loading is not possible, so why do it? Allow higher limit?
- Daily Monitoring of Fuel for Large Sources but Used Low Frequency (i.e. Backup Boilers)
- Guidance is a starting point, not a minimum standard