



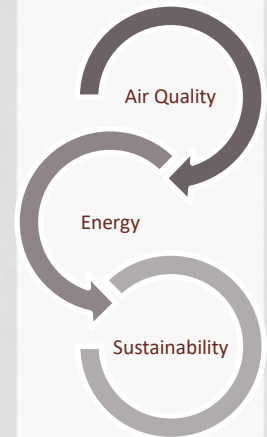
STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION



New Jersey Department of Environmental Protection
Division of Air Quality

PERMIT APPLICATIONS PRIOR TO 1998

PCP96's AND PCP97's



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PRE-NJEMs?

- Pre-NJEMs are permits approved before the existence of our NJEMs, New Jersey Environmental Management System (client-server application)
- Before 1998 (we called these permits PCP96's and PCP97's)

BACKGROUND

Before 1998, facilities completed pink and green forms to complete their permit applications

In 1998, NJEMS and Radius were released to allow for electronic submittal of applications

After 1998, the pre-NJEMS permits were created in the system with one piece of equipment and no compliance plan. An activity number was created for them (PCP 96's and 97's)

There were about 20K pre-NJEMS permits. Still have around 5k (~ 800 PCPs are expired)

In 2011, those paper permits were scanned and imported into NJEMS, under the existing activity number (PCP96's and 97's)

WHAT IS THE ISSUE?

- These PCPs don't include a complete compliance plan and the renewal invoices are not correct.

Compliance Plan

- Missing Permit Requirements!
- Missing list of all equipment

Invoices

- Renewed invoice(s) created incorrectly for most of the permits based on incorrect listing of equipment.

Q: Were there really no changes in operation since 1997 for more than 5,000 permits?

WHAT IS THE SOLUTION?

- INTERNAL ACTIONS

NON-EXPIRED (Continually renewed)

- Correct the count on equipment list manually for each PCP96 & PCP97
- Adjust the equipment inventory accordingly (that will correct the future renewal invoice)
- However, this is not correcting the permit requirements! (The real issue!)

EXPIRED

- Correct the count on equipment list manually for each PCP96 & PCP97
- Adjust the equipment inventory accordingly (that will correct the future renewal invoice)
- Refer to Enforcement for proper action!

WHAT IS THE SOLUTION? (CONT.)

- FACILITY ACTIONS

FACILITIES WITH ACTIVE APPLICATIONS

- Permit writers will review PCP96's and 97's
- Will determine the correct number of pieces of equipment
- Will adjust the future renewal invoice
- Permit writers will contact facility if they qualify for a general permit (GP)

FACILITIES WITH NO ACTIVE APPLICATIONS

- Facilities shall confirm if they did a modification to these permits to submit a new permit; PCP or GP
- Facilities are responsible to revise these PCPs or apply for an appropriate permit; if not Enforcement may take proper action
- During Enforcement inspections, they will confirm if the pieces of equipment permitted in PCP96's and 97's have not been modified

SUB 8 STATE IMPLEMENTATION PLAN (SIP)

- Subchapter 8 (N.J.A.C.7:27-8) has been incorporated into the State Implementation Plan which includes enforceable emission limitations or other control measures to attain the National Ambient Air Quality Standards (NAAQS)
- Each permit must have all applicable (State and Federal) requirements with appropriate reporting, monitoring, and recordkeeping requirements.

FEES

(FOR YOUR OWN REFERENCE)

Renewals

- \$1267 – Renewal of permit
- \$338 – per each additional piece of equipment per permit
- Certificate to operate good for five years

General Permit Registration

- \$820 including single or multiple pieces of equipment
- Certificate to operate good for five years

QUESTIONS

