

Transformation Update

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Air Permitting / Industrial Stakeholders Meeting - December 2, 2011



Transformation Update - **Application Readiness**

- Technical Review Checklist
 - stakeholder interest in quick turnaround
 - demand for predictable process - what to expect.....
 - recommendations from Permit Structure and Process Workgroup
 - LEAN - request for technical information, later in the process
 - a common checklist will minimize delays in permit review

- Netting Analysis Tool
 - standardized calculation tool for Netting Analysis
 - removes calculation burden/errors
 - same format for NJDEP staff and facilities
 - easier way for facilities to maintain Netting Analysis on-site
 - better enforceability

Transformation Update - Technical Review Checklist

- Technical Review Checklist Outline
 - Electronic master list for all permit modifications
 - Flag for new/modified
 - Screening criteria for significant/minor modification
 - Emission increases
 - Attainment/non-attainment determination
 - EJ facility? what needs to be done for technical review?
 - State rules applicability
 - Risk screening
 - Enforcement actions related to the modification
 - Subchapter 18 Applicability
 - SOTA determination
 - Federal Rule Applicability – NSPS, NESHAP, MACT, CAM
 - PSD Applicability

Transformation Update - **Technical Review Checklist**

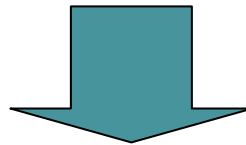
- Technical Review Checklist Subsets
 - Subchapter 18 Applicability
 - PSD Applicability Screening
 - Separate checklists for most common equipment:
 - boilers, engines, turbines, tanks, surface coating, etc.
 - includes emission calculations
 - comparison with State rule limits - compliance check

Transformation Update - **Netting Analysis Tool**

- Emission Offset Rule (Subchapter 18) requires:
 - facilities to perform Netting Analysis for all modifications
 - NI = IP + INP + IF + IA – DO – DC
 - NI: Net Emission Increase
 - IP: Any increase in Allowable Emissions for Permitted Sources
 - INP: Increase in Allowable Emissions from Non-Permitted Sources
 - IF: Increase in Fugitive Emissions
 - IA: Proposed Increase in Allowable Emissions
 - DO: Increase in Allowable Emissions if Emissions Offsets were secured
 - DC: Sum of all Creditable Emissions Reductions at the facility
 - All emissions, except IA, are during the contemporaneous period*
- Permit Rules (Subchapters 8 and 22) require:
 - facilities to submit Netting Analysis with permit modifications
 - facilities to maintain updated Netting Analysis on-site

Netting Analysis Tool - **BACKGROUND**

- Currently no specific format for the analysis
- Requires “case-by-case” deciphering by permitting staff
- Contemporaneous period determinations
- The process is repeated with each modification



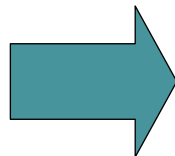
- Need to replicate calculations
- May result in inconsistencies / errors
- Requires higher level of spreadsheet knowledge/skills
- Authentication and verification issues
- Simple calculations, complicated data management

Netting Analysis Tool - New Tool, New Features

- Fully automated MS Access based tool for NJDEP and facilities
 - NJDEP: master database – data from all facilities
 - Facilities: database – facility's data only

Facility

- Enter/manage IA, INP, IF, DO, DC
- IA screen will show new IA (not submitted yet)
- Can pull past IA submissions based on BOP#
- New contemporaneous records highlighted
- Creates export dataset
- Zips dataset and names (facility+date+time)
- Submit with modification application
- Delete button for invalid/incorrect IAs



NJDEP

- Import data file into Master database
- Select import file, assign a BOP# for import
- Generate acknowledgement report (BOP#)
- New IA/contemporaneous data highlighted
- Review and approve
- Approval makes the IA an IP
- Ability to edit submitted data
- Delete button for invalid/incorrect IAs



NI Report
for the modification

Email to facility

NI Report for the modification
Save a copy in NJEMS

Transformation Update - **Implementation Schedule**

- Technical Review Checklist
 - outline completed
 - developing various elements
 - draft will be presented in next ISG meeting

- Netting Analysis Tool
 - conceptual model finalized
 - draft workplan being developed
 - progress update in next ISG meeting