



State of New Jersey

Department of Environmental Protection

Air Quality, Energy and Sustainability

Division of Air Quality

Bureau of Stationary Sources

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RESPONSE TO COMMENTS DOCUMENT

for

GP-021 / GOP-005 for Combined Heat and Power (CHP) Combustion Turbine(s); and

GP-022 / GOP-006 for CHP Spark Ignition Reciprocating Engine(s)

Written comments on the discontinuation of the general permits (GPs) and general operating permits (GOPs) were received from (1) Bill Wolfe and (2) Steven S. Goldenberg, Esq, Attorney for New Jersey Combined Heat and Power/Distributed Generation Coalition. No other comments were received. Responses to the comments received are addressed in this document.

1. Comment:

Can you provide data on the number and location of the holders of these GP's? (1)

Response:

The Department has received a total of eleven (11) general permits and three (3) general operating permits:

- One GP-021 located in Cherry Hill (Camden)
- Ten GP-022 located in: Whippany (Morris); Raritan Twp (Hunterdon); Harrison Twp (Gloucester); Cherry Hill (Camden); Princeton (Mercer); Princeton (Mercer); Toms River (Ocean); Lawrenceville (Mercer); Livingston (Essex)
- Three GOP-006 located in: Picatinny Arsenal (Morris County); New Brunswick (Middlesex County); Pennington (Mercer County).

2. Comment:

Can you estimate individual and cumulative "potential to emit" HAP's from these GP's? I'm pretty sure there is emissions reporting required under the GP. My question is not really related to the discontinuance it involved emissions that preceded the proposed discontinuance. (1)

Response:

No further evaluation of these general permits is being done at this time since these permits will be discontinued. After these general permits and general operating permits expire, a preconstruction permit application, or a modification application to a facility's Title V operating permit, will be required, at which time, the Department will evaluate the potential to emit for HAPs emissions including health risk assessment.

3. Comment:

Will the holders of discontinued GP's be required to come in for IP's? (1)

Response:

GPs approved before the date of discontinuation will continue to operate the CHP unit under the current GP until the first of the following events occur:

- Replacement or modification of the equipment registered in the current General Permit 021 and/or 022; or
- Expiration of the current General Permit 021 and/or 022.

Before the occurrence of either event mentioned above, the Permittee must apply for a standard Pre-Construction Permit (PCP) which will include the most updated state and federal regulations, including Health Risk Assessment for HAPs above the reporting thresholds.

GOPs approved before the date of discontinuation will be incorporated into the facility's Title V permit the first time the Title V permit is opened for a modification that proposes an increase in air contaminant emissions, or at time of permit renewal.

4. Comment:

If so, will this IP's include HAP emissions risk assessment reviews? (1)

Response:

Yes, for GPs and GOPs, health risk assessment will be performed for HAPs above the reporting thresholds, in accordance with the Permitting Guidance on the Department's website <https://www.state.nj.us/dep/aqpp/>.

5. Comment:

Are there any plans to revise the risk assessment methodologies or standards of Technical Manual 1003? Would it be fair to infer that there are revisions to TM 1003 underway that are unrelated to the proposed GP actions? (1)

Response:

Technical Manual 1003 was revised in 2018 to be consistent with current models, meteorological data and procedures. The revisions to Technical Manual 1003 and discontinuation of the CHP GPs and GOPs are independent actions.

6. Comment:

The decision to discontinue the GPs and GOPs would represent a critical and unnecessary blow to the CHP industry and clean energy sector generally and would undermine the State's energy efficiency and resilience goals. The costs associated with the design and installation of CHP systems are significant, therefore the availability of the GPs and GOPs options for acquiring necessary air permits makes the process significantly more cost-effective and provides needed certainty to project development schedules, a highly significant consideration to developers. The Coalition fully supports the Department's efforts to address the criteria set forth in the Department's Public Notice but urges the Department to maintain the use of the CHP general permit and general operating permits until such time as appropriate replacement for them are promulgated. (2)

Response:

The Department cannot continue to allow the use of the current GPs and GOPs until the deficiencies listed in the Department's Public Notices are addressed.

The Department will re-evaluate the need for these GPs and GOPs in the future based on interest (see Response #1) and resources, and possibly provide them as electronic applications on-line.

-End of Response-