



# Compliance Advisory

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Compliance & Enforcement #2021-09 Issued 8/25/21

## Do You Have an Air Permit With a 3-hour Rolling Average Based on 1-hour Blocks? You May Not be Reporting Exceedances Correctly

### WHO IS AFFECTED BY THIS ADVISORY?

Any facility in New Jersey subject to Air permit requirements that specify a Continuous Emission Monitor (CEM) averaging period consisting of a 3-hour rolling average based on 1-hour blocks.

### WHY IS DEP ISSUING THIS ADVISORY?

To clarify how exceedances of 3-hour rolling averages based on 1-hour blocks should be calculated and reported in Excess Emission Monitoring Performance Reports (EEMPRs). The Department provides the following guidance:

If one 3-hour block has an exceedance

The exceedance should be calculated as the average of each hour in the three-hour block.

If the exceedance "rolls" for greater than 3 hours

The exceedances should be calculated as the average of each 3-hour block that had been exceeded – i.e. the value is the average of the averages.

Specific examples of how this guidance should be implemented can be found here, <https://www.nj.gov/dep/bts/consult.html> under Technical Manuals section with document name "3-Hour Rolling Average Based on 1-Hour Blocks".

### WHAT IS DEP DOING?

The Department recognizes the potential need for affected facilities to review and re-program existing Data Acquisition System (DAS) software. Therefore, the Department is providing a grace period which will expire on March 31, 2022. After this date, facilities reporting incorrectly may be subject to enforcement action with penalties.

### WHAT SHOULD I DO?

Review your current DAS and determine if you are calculating exceedances correctly. A change or upgrade to your DAS software may be needed to accurately record and report exceedances.

If you have questions that relate to compliance with your permit conditions and/or the regulations, contact the appropriate Air Compliance & Enforcement office listed below. Ask to speak to a duty officer or contact your NJDEP Air inspector.

### WHO SHOULD I CONTACT WITH QUESTIONS?

<b>NJDEP Emission Measurement Section (EMS)</b>	<b>609-984-3443</b> <a href="mailto:BTS@dep.nj.gov">BTS@dep.nj.gov</a>
<b>Air Compliance and Enforcement - Northern Field Office</b> Covering Bergen, Essex, Hudson, Hunterdon, Morris, Passaic, Somerset, Sussex, Warren, and Union Counties	<b>973-656-4444</b> <a href="mailto:AirCE-Northern@dep.nj.gov">AirCE-Northern@dep.nj.gov</a>
<b>Air Compliance and Enforcement – Central Field Office</b> Covering Burlington, Mercer, Middlesex, Monmouth, and Ocean Counties	<b>609-292-3187</b> <a href="mailto:AirCE-Central@dep.nj.gov">AirCE-Central@dep.nj.gov</a>
<b>Air Compliance and Enforcement – Southern Field Office</b> Covering Atlantic, Camden, Cape May, Cumberland, Gloucester, and Salem Counties	<b>856-614-3601</b> <a href="mailto:AirCE-Southern@dep.nj.gov">AirCE-Southern@dep.nj.gov</a>

### WHERE CAN I GET MORE INFORMATION?

The following web sites can be accessed for additional information regarding this advisory:

- EMS Technical Manual TM1005:  
<https://www.nj.gov/dep/bts/pdf/Techmanuals/1005.pdf>
- For CEM averaging guidance:  
<https://www.nj.gov/dep/bts/consult.html> under Technical Manuals section.
- For general NJDEP information (Contact NJDEP):  
<http://www.nj.gov/cgi-bin/dep/contactdep.pl>
- To comment on this advisory:  
<http://www.nj.gov/dep/enforcement/survey.html>