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WHEN IS AN AIR PERMIT NEEDED?

- See N.J.A.C. 7:27-8.2 Applicability – READ FULL TEXT
- 7:27-8.2(c)2 – any equipment that has toxic emitted a rate > 0.1 pounds per hour
- 7:27-8.2(c)15 – any equipment which is used for treating groundwater, industrial waste water, or municipal wastewater with ......
- 7:27-8.2(c)16 - equipment that is used for treating waste soils or sludges, including ......
- 7:27-8.2(c)17 - equipment used for the purpose of venting a closed or operating dump or landfill
WHEN IS AN AIR PERMIT NEEDED?
(MORE)

• General Catch Alls
  • >50 lb/hr of use of material (NJAC 7:27-8.2 (c)19)
    • If digging up dirt, easily over 50 pounds if doing anything other than placing in a dump truck/roll-off for immediate removal
    • Nearly any in-situ treatment
  • >2000 gallon VOC storage (NJAC 7:27-8.2 (c)9)

• Exemption from Permitting
  • Sub-Slab Depressurization System Policy
    • **IF** the criteria is met – NO TOXICS
PERMITTING OPTIONS

• Online General Permits
  • GP 008 Site Remediation Activities for Gasoline Contamination at Vehicle Fueling Stations (SVE)

• Preconstruction Permits (PCP’s) - Use RADIUS Software, [https://www.state.nj.us/dep/aqpp/radius.html](https://www.state.nj.us/dep/aqpp/radius.html)
WHAT IS IN A COMPLETE AIR PERMIT APPLICATION?

- Air Permit application prepared using RADIUS software (imports into NJEMS)
  - RADIUS HELPLINE (609) 633-8250

- Include Emission calculations for all air pollutants (VOC’s, HAP’s etc.) above Reporting Thresholds – **CRITICAL STEP**

- Any other supporting information such as manufacturers data including air control device information, facility map, site plan needed for modeling, etc.
POTENTIAL SOURCES

- Soil might be your source!
- Mixing Equipment
- Waste Piles
- Treatment Pits
- Landfills
CONTROL TECHNOLOGIES

- Carbon Absorbers – should be a minimum of two in series (monitor breakthrough between two units)
- Flares - Enclosed Flares Only
- Thermal Oxidizer (might call it an incinerator)
- Other
STACKS

• Stack Configuration
  • Exhaust Flow Rate
  • Temperature
  • Height
  • Discharge Direction
  • Distance to Property Line (nearest environmental receptor)

• Maybe no Stack?
  • Discharge at ground level
  • No or limited Dispersion
WHAT IS IN AN AIR PERMIT APPROVAL?

• Very specific conditions – **READ THE PERMIT!**

• Monitoring and Recordkeeping

• No visible emissions (N.J.A.C. 7:27-6.2(d & e))

• No offsite odor (N.J.A.C. 7:27-5.1 and 5.2)

• Specific and enforceable limitations on emissions
TIMEFRAMES

• Approval takes time
  • Risk evaluation takes time if more than screening worksheet

• Odor concerns must be addressed

• Build in public comment period for Newark/Camden and any future EJ area
RISK ASSESSMENT (SIMPLE)

- Health Risk Screening Worksheet
  - Used for any air contaminant that is above reporting thresholds – see N.J.A.C. 7:27-17.9(b)

- Worksheet can be found at: https://www.state.nj.us/dep/aqpp/risk.html

- If Worksheet does not show negligible risks, a refined risk assessment must be conducted
RISK ASSESSMENT (MORE CHALLENGING)

• More refined analysis
• Evaluate the unique characteristics of the facility

What is Needed
• Atmospheric dispersion modeling protocol
• Detailed plot plan
• Protocol must be approved before modeling study is performed.
• Stack parameters

• Follow Technical Manuals 1002/1003 guidance
  https://www.state.nj.us/dep/aqpp/techman.html
QUESTIONS?

• Preconstruction Permit Help Line 609-292-6716
• Major Facility Help 609-633-8248
• General Number 609-292-0834
• Risk Questions 609-292-6722

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