

Permitting Numerous Small Sources Effectively: When Less is Better

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Background

- New Jersey is the most densely populated State
 - 8.7 Million residents
 - 7,417 mile² land area
 - ~1200 residents per mile²
- Pre-1995
 - Permits issued for each stack (single stack permits)
 - 17,000 facilities state-wide
 - More than 55,000 active permits with over 80,000 pieces of equipment
 - Around 5,000 applications received annually

Background

- 1996-Significant efforts implemented to streamline permitting process and reduce backlogs
 - NJ APCA amended to include
 - Title V Operating Permits
 - General Permits (GP)

General Permits Proliferate 1998-2009

- 1998
 - First four GPs issued
 - Paper Applications
 - Single Stack Permits
- 2009
 - 19 General Permits Available
 - Applications can submitted on-line (mandatory 1/2010)
 - Multiple Pieces of Equipment on each GP
 - Title V GOP in development

NJ Air Permitting Statistics

	<u>1996</u>	<u>2009</u>
■ Active Facilities	17,000	18,000
■ Active Permits	55,000	47,500
■ Preconstruction	60,000	32,000
■ Title V	0	300
■ General Permits	0	15,000 (21,000)
■ Equipment	80,000	90,000
■ Control Devices	10,000	11,000
■ Emission Points	55,000	58,000

What is a General Permit?

- Registration-like process
- Pre-approved (no agency review)
- Simple/common source categories
- Fixed set of pre-defined permit conditions
- Non-negotiable

Why General Permits?

- Provide consistency and predictability to the regulated community and public
- Provide convenient, expanded services to the regulated community
- Gain environmental benefits without the need to review individual permits
- Shift permit resources from simple sources to more complex sources
- Rapid turnaround at lower cost

Lessons Learned

- A web-based submittal system was developed in 2001.
- By 2005 only 15% of GPs submitted electronically.

Why?

- Paper form is just as simple as the web form
 - Financial incentive to file electronically
 - Mandatory electronic submission after 1/1/2010
 - Electronic applications must be paid by credit card or electronic funds transfer
 - A “Bill Me Later” function added 2007
- So far in 2009 57% of GPs submitted electronically

Keys to Success

- Start with a high volume, simple process
- Keep it simple (design for 85%, not 100%)
- Make it secure
- Constituent involvement
- Make it easier and faster than paper
- Improve upon existing processes

More Keys to Success

■ Post-Implementation

- Incentives
- Training
- Marketing
- Help Line

General Permit	7/1/2009	Current
(GP-001) Solid Receiving and Storage	608	393
(GP-002) Abrasive Blasting	126	93
(GP-003) Woodworking	58	44
(GP-004) Gasoline Dispensing	4132	3012
(GP-005) Emergency Generator	5332	3098
(GP-006) Boiler	6457	4178
(GP-006A) Boiler Heater	2515	2028
(GP-007) Non-Floating Roof Storage Tank(s)	264	157
(GP-008) Site Remediation for Gasoline Contamination	380	283
(GP-009) Boiler Combustion Equipment	55	41
(GP-010) Degreasing Operations	19	14
(GP-011) MACT Degreasing Operations		
(GP-012) Drycleaning Facilities	481	392
(GP-013) Non-HAP Drycleaning Facilities	356	318
(GP-014) Stage 1 Gasoline Dispensing	262	224
(GP-016) Small Emitter General Air Permit (SEGAP)		
(GP-017) Boilers < 5 MMBTU/hr	305	235
(GP-018) Boilers < 10 MMBTU/hr	55	40
Total General Permits	21405	14550

Questions

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