



STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

GENERAL PERMITS

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Two Permitting Procedures for Minor Facilities

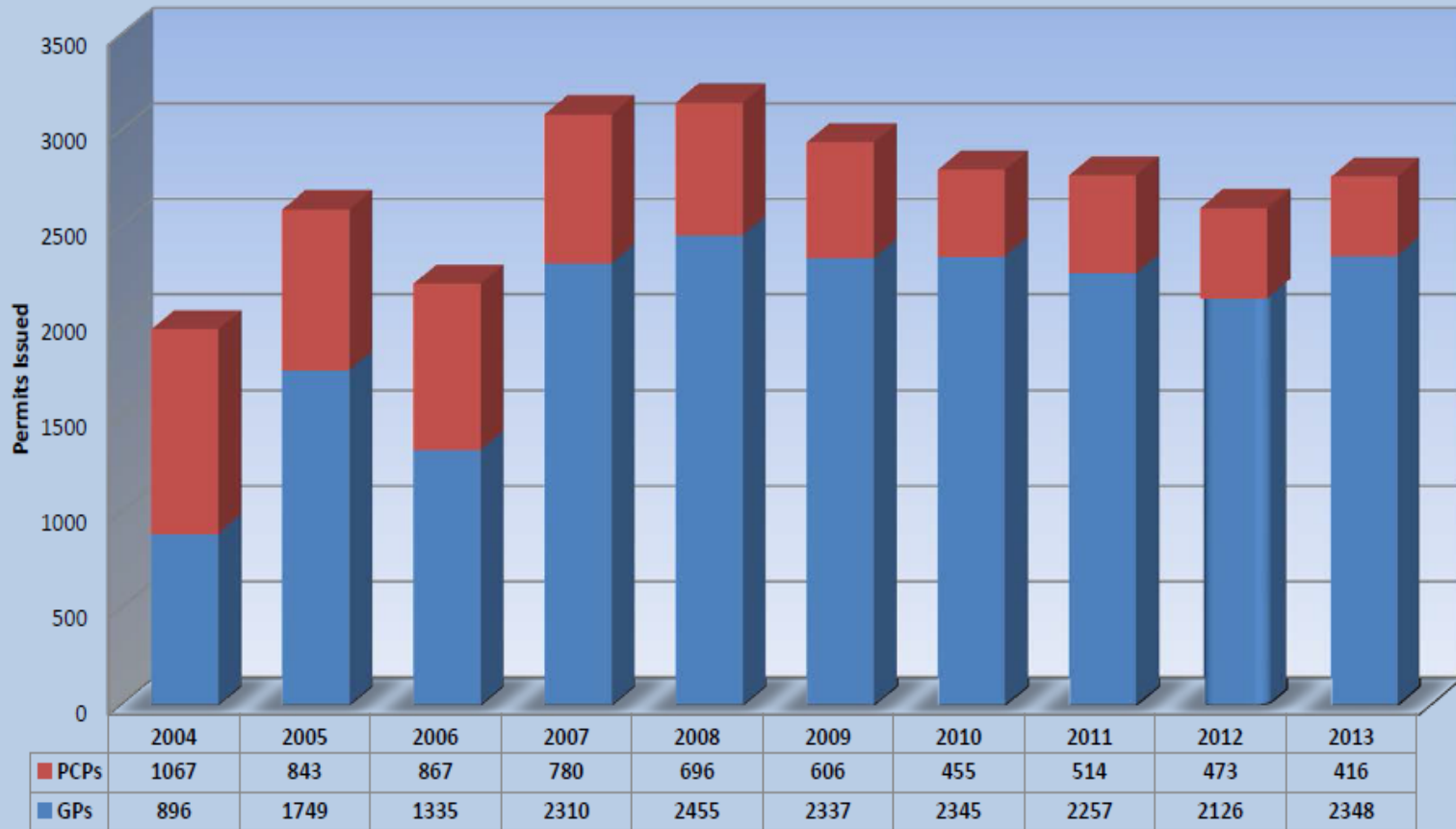
- Case- by-Case
 - Preconstruction Permits (PCPs) –
Electronic Application for Minor Sources
 - 60 day average processing time

- General Permits (GPs)
 - On-line Registration
 - Immediate authorization to construct

General Permits (GP)

1. A GP is a pre-approved permit to construct and certificate to operate.
2. Each GP applies to a specific class of common sources
3. Conditions are fixed.

PCPs and GPs Issued from 2004 - 2013



	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Total Permits Issued	1963	2592	2202	3090	3151	2943	2800	2771	2599	2764
Percentage of New PCPs	54.4%	32.5%	39.4%	25.2%	22.1%	20.6%	16.3%	18.5%	18.2%	15.1%
Percentage of New GPs	45.6%	67.5%	60.6%	74.8%	77.9%	79.4%	83.8%	81.5%	81.8%	84.9%

Minor Facility Permits

- 19,394 regulated minor facilities.
- 12,994 (67%) have general permit.
- 4,588 (24%) have regular permit.
- 1,812 (9%) have regular permit and general permit.

Equipment regulated at Minor Facilities

- 68,954 total regulated equipment
- 28,948 (42%) with general permit
- 3.6 regulated equipment per minor facility
- 85% of new equipment permitted with a G.P. in 2013

GP Development Process

1. Identify a source category that has sufficient demand and meets standards to qualify for a GP
2. Collaboration of air permitting, compliance and enforcement, small business assistance and external stake holders

GP Development Process (cont.)

3. Incorporate all State and Federal applicable regulations
4. Announce the General Permit to the public in the NJ Register and solicit public comments
5. Incorporate internal and public comments as appropriate
6. Announcement of availability for use in the NJ Register
7. General permits are made available online

Resource Needs

- Time Frame to complete process is typically 1 year
- Significant staff time required
- Updating G.P. periodically needed

What is included in a GP?

1. Criteria for eligibility
2. Exclusions (what can not have a GP)
3. Equipment and control specifications
4. Automatic calculation of the potential to emit (options for PTE)
5. Submittal and Contact information
6. Compliance plan with all adopted state and federal rule requirements

General Permits Advantages

- Environmental Benefit
- Cost Savings
- Same Day Permit Approval

WIN - WIN

Cost Saving to Facility

- Fee \$410 (including multiple pieces of equipment)
- Compared to \$1755 base fee, plus additional \$410 for each piece of minor source permitted equipment in a regular minor source permit

Environmental Benefit

- GP's contain comprehensive emission control standards that meet or exceed State of The Art (SOTA)
- SOTA = minor source BACT

Examples of Environmental Benefits

- Require combustion sources, like boilers and diesel emergency generators, to use ultra low sulfur fuel earlier than regulatory mandates
- To qualify for a boiler GP, the boiler must meet SOTA emission limits and only cleaner fuels like natural gas and light distillate can be used.

Examples of Environmental Benefit (cont.)

- The emergency generator GP requires pollution prevention measures that involve mandatory annual combustion adjustments to optimize engine efficiency
- For Gasoline stations the GP requires additional vapor recovery controls

Examples of Environmental Benefit (cont.)

- Restrict the use of Perchloroethylene in co residential dry cleaning operations ahead of MACT

Advantage of GP over Permit by Rule

- With a GP the State maintains information on source operation
- Facility actually has a permit to show the public.
- Much more effective for maintaining compliance than referring to a rule text that could be ignored or not interpreted correctly.

Advantage of GP over Permit by Rule (cont.)

- GP's provide instant ability to construct and operate.
- Smart calculations and options on production limitations serve to allow facility to limit potential to emit

Advantage of GP over Permit by Rule (cont.)

- Assists Compliance and Enforcement
 - Facility must certify that equipment is subject to GP applicability criteria and that all GP conditions are complied with
 - GP's have a certificate to operate fee every 5 years to fund compliance inspections.

Evaluations That Go Into GP Development

1. Ensure update federal and state regulatory requirements are written with clear enforceable compliance plan language.
2. Conduct risk assessment for toxics and model for “worst case” criteria pollutant emissions to ensure the local public is protected.

Evaluations That Go Into GP Development

3. General permits provide options to limit PTE. These options are typically capped at half of a regulatory trigger.
4. Example : 12.5 tons/year of NO_x to ensure Title V and NSR triggers are not reached.

CURRENTLY AVAILABLE GP's

- 22 different General Permits available for Minor Sources
- 4 General Operating Permits for Major facilities
- <http://www.state.nj.us/dep/aqpp/gp1list.htm>

Source Types Eligible for a GP

GP-001 Bulk Solid Materials Receiving and Storage Systems

GP-002 Confined Abrasive Blasting Equipment

GP-003 Woodworking Equipment

GP-004A Fuel Dispensing Facilities

GP-005A Emergency Generator

GP-007 Stationary Non-Floating Roof Storage Tank(s) Storing Volatile Organic Compounds

GP-008 Site Remediation Activities for Gasoline Contamination at Vehicle Fueling Stations (SVE)

GP-009A Boiler(s) and Indirect Fired Process Heater(s) Each Greater Than or Equal to 10 MMBTU/hr and Less Than 50 MMBTU/hr Combusting Gaseous Fuel

Source Types Eligible for a GP

GP-010 NON-HAP Degreaser

GP-011 Degreasing Operations Using Only Methylene Chloride or 1,1,1Trichloroethane Solvents

GP-012A Perchloroethylene Dry-cleaning Equipment

GP-013 Non-HAP Drycleaning

GP-015 Non-MACT Plating Operations

GP-016 Small Emitter General Air Permit (SEGAP)

GP-017 Boiler(s) and/or Heater(s) Each Less Than 5 MMBTU/hr

GP-018 Boiler(s) and/or Heater(s) Each Less Than 10 MMBTU/hr

GP-019 Portable Equipment

Source Types Eligible for a GP

GP-020 Research & Development

GP-021 Combined Heat and Power Combustion Turbine(s) less than or equal to 65 MMBTU per hour

GP-022 Combined Heat and Power Stationary Spark Ignition Reciprocating Engine(s) less than or equal to 65 MMBTU per hour

General Operating Permits (GOP)

GOP-002 Small Emitter General Air Permit (SEGAP)

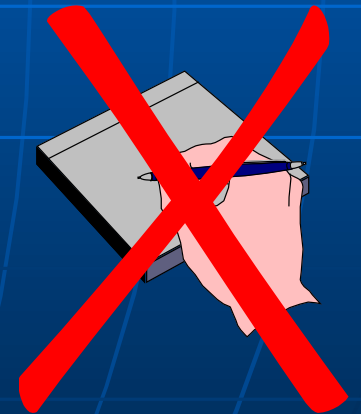
GOP-003 Emergency Generator Permit

GOP-005 Combined Heat and Power Combustion Turbine(s) less than or equal to 65 MMBTU per hour

GOP-006 Combined Heat and Power Stationary Spark Ignition Reciprocating Engine(s) less than or equal to 65 MMBTU per hour

How To Register

- Online Business Portal
www.njdeponline.com
- Paper (Not allowed as of January, 2010)
- Saves administrative resources and allows for same day approval



General Permit Help Line (609) 633-2829

- Two full time customer serve reps help mostly small businesses complete GP applications on line.

Air Director Perspective on General Permits

- High quality comprehensive air permit
- Customized for each industry (their language)
- Protective of public health (modeling risk assessment)
- Enforceable (clear compliance plan)
- Efficient low cost way to permit smaller common sources
- Fees generate needed revenue for enforcement and updating
- Applicants like online registration/immediate approval process