ISG GP/GOP UPDATE

October 4, 2019

Mayra Reyes, Division of Air Quality
GPs AND GOPs UNDER CONSTRUCTION

- **Emergency Generators:**
  - **Revised GP-005A / GOP-003 and GP-005B /GOP-004**
    - GP-005A / GOP-003 Emergency Generator(s) Burning Distillate Fuels
    - GP-005B /GOP-004 Emergency Generator(s) Burning Gaseous Fuels
  - The revised General permits incorporate the revised definition of emergency generator at N.J.A.C. 7:27-8.2 and 19.1 regarding construction, repair and maintenance (CRM) activities.
  - More than one version of these General Permits: Apply as needed for CRM activities
  - General Permits (Revised GP-005A and GP-005B) are available since September 16th
  - General Operating Permits (Revised GOP-003 and GOP-004) went for public comments on September 3rd (until October 3rd). Tentative date for availability January 6th
GPs AND GOPs UNDER CONSTRUCTION

- **GP-009B and GOP-009** - Boiler(s) each greater than or equal to 10 MMBTU/hr and less than 50 MMBTU/hr;
  - Smart calculations;
  - The minimum Stack height required is 20 feet
  - Manufacturer’s specification for each boiler is required to be submitted as an attachment at the time of registration. If initial stack test was performed for that boiler greater than or equal to 25 MMBTU/hr, the results should be submitted at the time of registration.
  - This GP will replace GP-009A
- Public comments ended on September 18th
- Testing online design
- Availability date January 6th
GP-019A – Temporary Equipment

- To simplify and incorporate State Rule Changes (N.J.A.C.7:27-8). Same sources will be covered.
- To limit the GP for one year
- The operation will be based on SOTA limitation
- This GP will replace GP-019
- Public comments period started on September 16th (public comments will end on October 16th)
DISCONTINUATION OF GPs AND GOPs

Discontinuation of the following GPs and GOPs:

- GP-021/GOP-005 Combined Heat and Power (CHP) Combustion Turbine(s); AND
- GP-022/GOP-006 CHP Spark Ignition Reciprocating Engines

Justification of discontinuation:

- The GP/GOP’s do not address health risk from all HAPs consistent with the new reporting thresholds and new risk factors.
- They do not include a VOC limit that includes formaldehyde.
- Calculations are inaccurate: This is problematic since the results from the required stack testing are not corresponding with the GP and permit limits.
- They do not include a commissioning operating scenario.
- The GP/GOPs are rarely used. A total of 11 GPs and 3 GOPs have been received since 9/19/2011.

The Department is considering to review these GPs / GOPs at a future date.

Tentative date to start public comments on November 18th
GP-008A – Site Remediation Activities

- To limit the GP for five years
- Expand the site remediation activity for non-gasoline stations using same type of control as existing GP-008.
- Still considering the possibility to create a GOP for major facilities
- Planning to start after GP-009B approval
HELPLINES

• General Permits (609) 633 - 2829
• Operating Permits (609) 633 - 8248
• Pre-Construction (609) 292 - 6716
• RADIUS (609) 633 - 8250