PERMIT APPLICATIONS PRIOR TO 1998 (PCP96’S AND 97’S)

February 1, 2019

Mike Adhanom, Section Chief, Division of Air Quality
Pre-NJEMs?

- Pre-NJEMs are permits approved before the existence of our NJEMs, New Jersey Environmental Management System (client-server application)

- Before 1998 (we called these permits PCP96’s and PCP97’s)
Before 1998, facilities completed pink and green forms to complete their permit applications

In 1998, NJEMS and Radius were released to allow for electronic submittal of applications

After 1998, the pre-NJEMs permits were created in the system with one piece of equipment and no compliance plan. An activity number was created for them (PCP 96’s and 97’s)

There were about 20K pre-NJEMs permits. Still have around 5k (~ 800 PCPs are expired)

In 2011, those paper permits were scanned and imported into NJEMs, under the existing activity number (PCP96’s and 97’s)
What is the issue?

- These PCPs don’t include a complete compliance plan and the renewal invoices are not correct.

<table>
<thead>
<tr>
<th>Compliance Plan</th>
<th>Invoices</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Missing Permit Requirements!</td>
<td>• Renewed invoice(s) created incorrectly for most of the permits based on incorrect listing of equipment.</td>
</tr>
<tr>
<td>• Missing list of all equipment</td>
<td></td>
</tr>
</tbody>
</table>

Q: Were there really no changes in operation since 1997 for more than 5,000 permits?
What is the Solution?

**INTERNAL ACTIONS**

**NON-EXPIRED (Continually renewed)**
- Correct the count on equipment list manually for each PCP96 & PCP97
- Adjust the equipment inventory accordingly (that will correct the future renewal invoice)
- However, this is not correcting the permit requirements! *(The real issue!)*

**EXPIRED**
- Correct the count on equipment list manually for each PCP96 & PCP97
- Adjust the equipment inventory accordingly (that will correct the future renewal invoice)
- Refer to Enforcement for proper action!
What is the Solution? (cont.)

• FACILITY ACTIONS

FACILITIES WITH ACTIVE APPLICATIONS

• Permit writers will review PCP96’s and 97’s
• Will determine the correct number of pieces of equipment
• Will adjust the future renewal invoice
• Permit writers will contact facility if they qualify for a general permit (GP)

FACILITIES WITH NO ACTIVE APPLICATIONS

• Facilities shall confirm if they did a modification to these permits to submit a new permit; PCP or GP
• Facilities are responsible to revise these PCPs or apply for an appropriate permit; if not Enforcement may take proper action
• During Enforcement inspections, they will confirm if the pieces of equipment permitted in PCP96’s and 97’s have not been modified
Sub 8 State Implementation Plan (SIP)

• Subchapter 8 (N.J.A.C.7:27-8) has been incorporated into the State Implementation Plan which includes enforceable emission limitations or other control measures to attained the National Ambient Air Quality Standards (NAAQS)

• Each permit must have all applicable (State and Federal) requirements with appropriate reporting, monitoring, and recordkeeping requirements.
Renewals

- $1267 – Renewal of permit
- $338 – per each additional piece of equipment per permit
- Certificate to operate good for five years

General Permit Registration

- $820 including single or multiple pieces of equipment
- Certificate to operate good for five years
PCP-96 and PCP-97 Compliance Advisory

Who is affected?
A regulated facility with sources permitted under PCP96 and/or PCP97. These activities are known as Pre-NJEMs. Pre-NJEMs are permits approved before the existence of the Department’s New Jersey Environmental Management System (NJEMS) (client-server application).

What equipment or sources are affected?
All equipment or sources permitted under a PCP-96 and/or PCP-97.

What is the issue?
These PCPs do not include all the applicable requirements and the renewal invoices are not correct.

What is NJDEP doing?
Subchapter R (N.J.A.C. 7:27-8) has been incorporated into the State Implementation Plan which includes enforceable emission limitations or other control measures to attain the National Ambient Air Quality Standards (NAAQS). Each permit must have all applicable (State and Federal) requirements with appropriate reporting, monitoring, and recordkeeping requirements.

The Department will be taking internal and external actions to resolve this issue.

Internal Actions:
- For each PCP-96 & PCP-97, the list of equipment in the permit(s) will be corrected.
- The renewal invoice will be revised accordingly, which will correct future renewal invoice.
- Facilities with expired PCP-96 and/or PCP-97 will be referred to Compliance & Enforcement for appropriate enforcement action.

Facility Actions:
- Facilities with active applications: The Permit writer will review any existing PCP-96’s and PCP-97’s to determine the correct number of pieces of equipment. The renewal invoice will be adjusted accordingly and the Department will contact the facility if they qualify for a general permit (GP).
- Facilities with no active applications: If the permitted source(s) have been modified, facility shall submit a new permit (PCP or GP).

Facilities are responsible to revise these PCPs, if not Compliance & Enforcement will take appropriate enforcement action during inspection.

Background
- Before 1998, facilities completed pink and green forms to complete their permit applications
- In 1998, NJEMS and Radius were released to allow for electronic submittal of applications
- After 1998, the pre-NJEMs permits were created in the system with one piece of equipment and no compliance plan. An activity number was created for them (PCP 96’s and 97’s)
- There were about 20K pre-NJEMs permits. The Department still have around 5K (~ 800 PCPs are expired)
- In 2011, those paper permits were scanned and imported into NJEMS, under the existing activity number (PCP96’s and 97’s)

Who should I contact with questions?
Air Quality Permitting 609-292-6716
Air Compliance and Enforcement 973-656-4444 (Northern); 609-292-3137 (Central); 856-634-3001 (Southern)
Radius helpline 609-633-7259
General Permit Helpline 609-633-2829

Where can I get more information?
The following web sites can be accessed for additional information regarding this advisory:
- Division of Air Quality Permitting Program website: http://www.state.nj.us/dep/asppl
- Compliance and Enforcement website: http://www.nj.gov/dep/enforcement/
- For general NJDEP information (Contact NJDEP): http://www.nj.gov/dep/contactdeppl
- To comment on this advisory: http://www.nj.gov/dep/enforcement/survey.html

Please note this advisory is intended to be a summary explanation of a department initiative. It does not include all potentially applicable requirements. If you have any questions related to compliance with this initiative, please contact the Enforcement number listed above.
### Facilities with Active Preconstruction Permits Issued in 1996 and 1997

#### PI Number: 00009 - STEPAN CO

**STEPAN CO**  
100 W HUNTER AVE  
Maywood, Maywood 07607

<table>
<thead>
<tr>
<th>Non-DEP Contacts</th>
<th>Activity Number</th>
<th>Activity Type Description</th>
<th>Document Status</th>
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<tbody>
<tr>
<td>BOB PEACOCK</td>
<td>PCP960001</td>
<td>Construction of New Source</td>
<td>Renewed</td>
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<tr>
<td>VP &amp; GM</td>
<td>PCP960003</td>
<td>Construction of New Source</td>
<td>Renewed</td>
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<tr>
<td>JAMIL ALLEN</td>
<td>PCP960005</td>
<td>Construction of New Source</td>
<td>Renewed</td>
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<tr>
<td>ENVIRON ENGINEER</td>
<td>PCP960006</td>
<td>Construction of New Source</td>
<td>Renewed</td>
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<tr>
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<td>PCP960011</td>
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<tr>
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<td>PCP960038</td>
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<td>PCP960049</td>
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#### PI Number: 00066 - WESTMORELAND TREATMENT FACILITY

**WESTMORELAND TREATMENT FACILITY**  
11TH STREET  
Fair Lawn, Fair Lawn 07410

<table>
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<th>Document Status</th>
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<tbody>
<tr>
<td>JIL SCHNEIDER</td>
<td>PCP960001</td>
<td>Construction of New Source</td>
<td>Renewed</td>
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#### PI Number: 00102 - TEC-CAST

**TEC-CAST**  
440 MEADOW LANE  
Carlstadt, Carlstadt 07072696

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<tr>
<th>PI Number: L8608 - 1 Touch Cleaners</th>
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<tr>
<td>6216 Park Ave</td>
<td>West New York, West New York 07093</td>
</tr>
<tr>
<td>Non-DEP Contacts</td>
<td>Activity Number</td>
</tr>
<tr>
<td>Oscar Nunez</td>
<td>PCP970001</td>
</tr>
<tr>
<td>President</td>
<td>(201) 854-3214 xt</td>
</tr>
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<table>
<thead>
<tr>
<th>PI Number: L8809 - Towne Square Dry Cleaners</th>
<th>Towne Square Dry Cleaners</th>
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</thead>
<tbody>
<tr>
<td>876 Union Mill Rd</td>
<td>Mount Laurel, Mount Laurel 08054</td>
</tr>
<tr>
<td>Non-DEP Contacts</td>
<td>Activity Number</td>
</tr>
<tr>
<td>Owner</td>
<td>PCP970001</td>
</tr>
<tr>
<td>(609) 222-0228 xt</td>
<td>(609) 222-0228 xt</td>
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<thead>
<tr>
<th>PI Number: L8907 - Peoples Cleaners</th>
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</thead>
<tbody>
<tr>
<td>1031 Kaighn Ave</td>
<td>Camden, Camden 08103</td>
</tr>
<tr>
<td>Non-DEP Contacts</td>
<td>Activity Number</td>
</tr>
<tr>
<td>Clarence Peoples</td>
<td>PCP970001</td>
</tr>
<tr>
<td>Owner</td>
<td>(609) 964-4181 xt</td>
</tr>
</tbody>
</table>

**Total Facilities** 2151  
**Total Activities** 4050
QUESTIONS
HELPLINES

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