DIVISION OF AIR QUALITY
AIR QUALITY, ENERGY, AND SUSTAINABILITY

SUFFICIENT MONITORING
IN TITLE V AIR PERMITS
AUTHORITY

• Federal
  • 40 CFR 70.6(B)

• State of New Jersey
  • N.J.A.C. 7:27-22.9 (c) (2) (ii)
  • N.J.A.C. 7:27-22.16(o)
1. Monitoring/Recordkeeping Sufficient to Demonstrate Compliance With Applicable Requirement

2. Choice of Monitoring Method and Frequency of Monitoring Decided on Case-by-case Basis
MONITORING METHODS FOR EMISSION LIMITS

1. Continuous Emissions Monitoring (CEMs/COMs)
2. Stack Emission Testing
3. Periodic Emissions Monitoring (PMPs)
4. Calculations
5. Surrogate Monitoring
   a. Surrogate Emissions
   b. Surrogate Operating Parameters
MONITORING METHODS FOR OTHER LIMITS

- Appropriate Monitoring/Recordkeeping for All Relevant Parameters
  - Continuous
  - Periodic
- Physical Parameters (Recordkeeping)
  - Tank Capacity
  - Maximum Heat Input
- Operating Parameters
  - Hours of Operation
  - Temperature
TYPE & FREQUENCY OF MONITORING
CASE-BY-CASE BASIS

1. Consistent with Rule/Guidance
2. Accuracy of Emissions Calculations
3. Facility/Project Emissions Thresholds
4. Facility Location
5. Public Interest
6. Public Health Risk
7. Enforcement History
PREDICTABILITY & OPERATIONAL FLEXIBILITY

- Testing & Monitoring Guidance
  - Pre-approved by USEPA
  - Deviations Acceptable With Appropriate Justification
  - Deviations Subject To USEPA Approval
- Proposed By Applicant
  - Preferred Monitoring Method
  - Already Used For Operational Purposes
  - Subject To NJDEP Approval
AIR PERMIT STAKEHOLDERS

- Applicant
- Public
- Environmental Organizations
- USEPA
- Surrounding States
- NJDEP – Permitting & Enforcement