Transformation Update
Khawar Kalim, Air Quality Permitting Program
Air Permitting / Industrial Stakeholders Meeting - December 2, 2011
Transformation Update - Application Readiness

- Technical Review Checklist
  - stakeholder interest in quick turnaround
  - demand for predictable process - what to expect.....
  - recommendations from Permit Structure and Process Workgroup
  - LEAN - request for technical information, later in the process
  - a common checklist will minimize delays in permit review

- Netting Analysis Tool
  - standardized calculation tool for Netting Analysis
  - removes calculation burden/errors
  - same format for NJDEP staff and facilities
  - easier way for facilities to maintain Netting Analysis on-site
  - better enforceability
Technical Review Checklist Outline

- Electronic master list for all permit modifications
- Flag for new/modified
- Screening criteria for significant/minor modification
- Emission increases
- Attainment/non-attainment determination
- EJ facility? what needs to be done for technical review?
- State rules applicability
- Risk screening
- Enforcement actions related to the modification
- Subchapter 18 Applicability
- SOTA determination
- Federal Rule Applicability – NSPS, NESHAP, MACT, CAM
- PSD Applicability
Technical Review Checklist Subsets

- Subchapter 18 Applicability
- PSD Applicability Screening
- Separate checklists for most common equipment:
  - boilers, engines, turbines, tanks, surface coating, etc.
  - includes emission calculations
  - comparison with State rule limits - compliance check
Emission Offset Rule (Subchapter 18) requires:

- facilities to perform Netting Analysis for all modifications

\[ NI = IP + INP + IF + IA - DO - DC \]

- NI: Net Emission Increase
- IP: Any increase in Allowable Emissions for Permitted Sources
- INP: Increase in Allowable Emissions from Non-Permitted Sources
- IF: Increase in Fugitive Emissions
- IA: Proposed Increase in Allowable Emissions
- DO: Increase in Allowable Emissions if Emissions Offsets were secured
- DC: Sum of all Creditable Emissions Reductions at the facility

All emissions, except IA, are during the contemporaneous period

Permit Rules (Subchapters 8 and 22) require:

- facilities to submit Netting Analysis with permit modifications
- facilities to maintain updated Netting Analysis on-site
Netting Analysis Tool - **BACKGROUND**

- Currently no specific format for the analysis
- Requires “case-by-case” deciphering by permitting staff
- Contemporaneous period determinations
- The process is repeated with each modification

- Need to replicate calculations
- May result in inconsistencies / errors
- Requires higher level of spreadsheet knowledge/skills
- Authentication and verification issues
- Simple calculations, complicated data management
Netting Analysis Tool - New Tool, New Features

- Fully automated MS Access based tool for NJDEP and facilities
  - NJDEP: master database – data from all facilities
  - Facilities: database – facility’s data only

<table>
<thead>
<tr>
<th>Facility</th>
<th>NJDEP</th>
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<tbody>
<tr>
<td>Enter/manage IA, INP, IF, DO, DC</td>
<td>Import data file into Master database</td>
</tr>
<tr>
<td>IA screen will show new IA (not submitted yet)</td>
<td>Select import file, assign a BOP# for import</td>
</tr>
<tr>
<td>Can pull past IA submissions based on BOP#</td>
<td>Generate acknowledgement report (BOP#)</td>
</tr>
<tr>
<td>New contemporaneous records highlighted</td>
<td>New IA/contemporaneous data highlighted</td>
</tr>
<tr>
<td>Creates export dataset</td>
<td>Review and approve</td>
</tr>
<tr>
<td>Zips dataset and names (facility+date+time)</td>
<td>Approval makes the IA an IP</td>
</tr>
<tr>
<td>Submit with modification application</td>
<td>Ability to edit submitted data</td>
</tr>
<tr>
<td>Delete button for invalid/incorrect IAs</td>
<td>Delete button for invalid/incorrect IAs</td>
</tr>
</tbody>
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NI Report for the modification
Email to facility
NI Report for the modification
Save a copy in NJEMS
Technical Review Checklist

- outline completed
- developing various elements
- draft will be presented in next ISG meeting

Netting Analysis Tool

- conceptual model finalized
- draft workplan being developed
- progress update in next ISG meeting