

# Compliance & Enforcement AIR PROGRAM

October 2014  
By – Larry Si





## Top 2 Issues

1. Unpermitted sources
2. Failure to read and comply with permit conditions



# Unpermitted Sources

Sources subject to :

- N.J.A.C. 7:27-8

<http://www.state.nj.us/dep/aqm/Sub8.pdf>

- N.J.A.C. 7:27-22

<http://www.state.nj.us/dep/aqm/Sub22.pdf>





# Types of Permit

For N.J.A.C. 7:27-8 facilities (minor/SM/SM8o)

- General Permit (GP)
- Pre-construction Permit (PCP)



# Types of Permit

For N.J.A.C. 7:27-22 facilities (major / Title V)

- General Operating Permit (GOP)
- Operating Permit (BOP)



# Failure To Comply

Failure to read and comply with permit conditions:

- Applicable Requirements
- Monitoring Requirements
- Recordkeeping Requirements
- Submittal/Action Requirements



New Jersey Department of Environmental Protection  
Facility Specific Requirements

Emission Unit: U1 PC Main Boiler  
Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submission/Action Requirement
1	<p>Conduct comprehensive stack emission testing of PC boiler as follows: For coal firing, stack tests for criteria pollutants (TSP &amp; PM-10), heavy metals (As, Be, Cd, Cr, Co, Pb, Mn, Hg, Ni), and acid gases (HCl &amp; HF) shall be conducted annually to demonstrate compliance with the emission limits. Additionally, stack test for criteria pollutants (TSP, PM-10, NOx, SO2, CO, VOC), heavy metals and acid gases as listed above, non-metals (P &amp; Se), total dioxins/furans, and POM within 42 months from the date of the approved Operating Permit. When stack testing, three consecutive runs shall be conducted at no less than 95% load. Heat input (MMBtu/hr, HHV) shall be determined for each stack test. [N.J.A.C. 7:27-22.16(e)]</p>	<p>Other: Monitored by stack emission testing. Stack testing shall be conducted for TSP, PM-10, NOx, SO2, CO, VOC, and HAPs, as applicable. (See Applicable Requirement). [N.J.A.C. 7:27-22.16(e)].</p>	<p>Recordkeeping by stack test results at the approved frequency. [N.J.A.C. 7:27-22.16(e)]</p>	<p>Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule Submit a stack test protocol to the Bureau of Technical Services (BTS) at PO Box 437, Trenton, NJ 08625 within 90 days from the date of the approved operating permit. Within 30 days of protocol approval or no less than 60 days prior to intended test date, whichever is later, the permittee must contact BTS at 609-530-4041 to schedule a mutually acceptable test date. The initial stack test must be conducted within 270 days from the date of the approved permit. The stack test report must be submitted to BTS within 45 days after performing the stack test pursuant to N.J.A.C. 7:27-22.19(d). A copy of the stack test results must be submitted to the Southern Regional Enforcement Office of NJDEP at the same time. The test results must be certified by a New Jersey licensed professional engineer or certified industrial hygienist. A copy of the test results must be submitted with the operating permit renewal application due at least 12 months prior to expiration of the OP. Test results shall be reported lb/hr, lb/MMBTU (HHV), ng/dscm for total dioxins/furans and POM constituents, and ppmvd @ 7% O2 except for particulate matter, dioxins/furans and POM. Emissions of the following 16 POM constituents shall be specified and reported: naphthalene, acenaphthene, acenaphthylene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo(ghi)perylene, benz(a)anthracene, chrysene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene. [N.J.A.C. 7:27-22.16(a)]</p>

BOP120004

**New Jersey Department of Environmental Protection  
Facility Specific Requirements**

Emission Unit: U1 PC Main Boiler

Operating Scenario: OS1 PC Boiler: normal firing using coal and/or No. 2 fuel oil

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	No visible emissions greater than 20% opacity, exclusive of condensed water vapor, except for a period of not longer than three minutes in any consecutive 30-minute period. [N.J.A.C. 7:27-3.2(a)] & [N.J.A.C. 7:27-3.2(c)]	Monitored by continuous opacity monitor continuously, based on any consecutive 30-minute period [N.J.A.C. 7:27-3.2(a)] & [N.J.A.C. 7:27-3.2(c)]	Recordkeeping by data acquisition system (DAS) / electronic data storage continuously [N.J.A.C. 7:27-3.2(a)] & [N.J.A.C. 7:27-3.2(c)]	None.
2	Particulate emission limit from the combustion of fuel based on rated heat input of source. Particulate Emissions <= 212 lb/hr. [N.J.A.C. 7:27-4.2(a)]	Other: Stack Emission Testing. (See Applicable Requirement for PT1)[N.J.A.C. 7:27-4.2(a)].	Particulate Emissions: Recordkeeping by stack test results at the approval frequency (See Applicable Requirement for PT1). [N.J.A.C. 7:27-4.2(a)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule (See Applicable Requirement for PT1). [N.J.A.C. 7:27-4.2(a)]
3	Sulfur Content in Fuel <= 2,000 ppmw (0.2% by weight) for zone 3. Effective through June 30, 2014. [N.J.A.C. 7:27-9.2(a)]	Sulfur Content in Fuel: Monitored by review of fuel delivery records per delivery. [N.J.A.C. 7:27-22.16(o)]	Sulfur Content in Fuel: Recordkeeping by invoices / bills of lading / certificate of analysis per delivery showing fuel sulfur content. [N.J.A.C. 7:27-22.16(o)]	None.
4	Sulfur Content in Fuel <= 500 ppmw (0.05% by weight) for Zone 3. Effective July 1, 2014 through June 30, 2016. [N.J.A.C. 7:27-9.2(a)]	Sulfur Content in Fuel: Monitored by review of fuel delivery records per delivery. [N.J.A.C. 7:27-22.16(o)]	Sulfur Content in Fuel: Recordkeeping by invoices / bills of lading / certificate of analysis per delivery showing fuel sulfur content. [N.J.A.C. 7:27-22.16(o)]	None.
5	Sulfur Content in Fuel <= 15 ppmw (0.0015% by weight) for Zone 3. Effective July 1, 2016. [N.J.A.C. 7:27-9.2(a)]	Sulfur Content in Fuel: Monitored by review of fuel delivery records per delivery. [N.J.A.C. 7:27-22.16(o)]	Sulfur Content in Fuel: Recordkeeping by invoices / bills of lading / certificate of analysis per delivery showing fuel sulfur content. [N.J.A.C. 7:27-22.16(o)]	None.
6	Fuel stored in New Jersey that met the applicable maximum sulfur content standard of Tables 1A or 1B of N.J.A.C. 7:27-9.2 at the time the fuel was stored in New Jersey may be stored, offered for sale, sold, delivered or exchanged in trade, for use in New Jersey, after the effective date of the applicable standards in Table 1B. [N.J.A.C. 7:27-9.2(a)]	None.	None.	None.
7	Maximum allowable sulfur dioxide emissions based on grade of fuel and geographical zone. The emission limit for SO <sub>2</sub> in this requirement is effective until June 30, 2014. SO <sub>2</sub> <= 0.2 % by weight. [N.J.A.C. 7:27-9.2(c)]	SO <sub>2</sub> : Monitored by review of fuel delivery records per delivery. [N.J.A.C. 7:27-9.2(c)]	SO <sub>2</sub> : Recordkeeping by invoices / bills of lading / certificate of analysis per delivery. [N.J.A.C. 7:27-9.2(c)]	None.



# LISTSERVS

\*Air Permitting –

<http://www.nj.gov/dep/aqpp/listserv.html>

Emission Statement –

<http://www.nj.gov/dep/aqm/es/listserv.htm>

Air Rules –

<http://www.state.nj.us/dep/baqp/airrules.html>

Stop The Soot –

<http://www.stophesoot.org/sts-listserv.htm>

\*Air Quality Forecast –

<http://www.enviroflash.info/>

\*Compliance & Enforcement -

<http://www.nj.gov/dep/enforcement/listserv.html>

# NJDEP Online Help

Item	DEP Program	Phone #
Setting up account in portal and general portal access	Bureau of Air Permits	609-633-2829
General Permits	Bureau of Air Permits	609-633-2829
Permit/Certificate Folder	Bureau of Air Permits	609-633-2829
Annual Combustion Adjustment (NOx RACT)	Compliance & Enforcement	See next page
Excess Emission & Monitoring Report (EEMPR)	Compliance & Enforcement	See next page
Annual Compliance Certification	Compliance & Enforcement	See next page
Six-month Deviation Report	Compliance & Enforcement	See next page
Diesel Retrofit	Diesel Retrofit Program	609-292-7953
Billing	All	609-633-2829

# NJDEP Online Help

## **Air Compliance & Enforcement Regional Offices:**

- **Northern Regional Office: (973) 656-4444**  
**Counties:** Bergen, Essex, Hudson, Hunterdon, Morris, Passaic, Somerset, Sussex, Union & Warren
- **Central Regional Office: (609) 292-3187**  
**Counties:** Burlington, Mercer, Middlesex, Monmouth & Ocean
- **Southern Regional Office (856) 614-3601**  
**Counties:** Atlantic, Camden, Cape May, Cumberland, Gloucester & Salem





[ClipartOf.com/11004](http://ClipartOf.com/11004)