

DIVISION OF AIR QUALITY AIR QUALITY, ENERGY, AND SUSTAINABILITY

ISG GP/GOP UPDATE

February 7, 2020

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Sustainability

UPDATES ON GPs AND GOPs

NEW GPs AND GOPs AVAILABLE

- Revised GOP-003 and GOP-004 for Emergency Generators:
 - GOP-003 for an Emergency Generator burning liquid fuels
 - GOP-004 for an Emergency Generator burning gaseous fuels
 - The revised general operating permits incorporated 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.
 - Both General Operating Permits have been available since January 21, 2020

NEW GPs AND GOPs AVAILABLE

- 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 per each boiler 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.
 - General permit, GP-009B replaced GP-009A.
 - GOP-009 received public comments (working on the Response to comments document).
 - GP-009B availability date was February 3, 2020.
 - GOP-009 tentative date May 4, 2020

GPs AND GOPs UNDER CONSTRUCTION

• **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
- General permit, GP-019A will replace GP-019
- Tentative Date, March 16th or April 6th.

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.
- Public comments ended on January 15th. Public comments received (working on the Response to comments document).
- Tentative Date March 16th
- The Department is considering to review these GPs / GOPs at a future date.

UPDATES ON OTHER PROJECTS

FACILITIES WITH ACTIVE PRECONSTRUCTION PERMITS ISSUED IN 1996 AND 1997

- Pre-NJEMs are permits approved before the existence of our NJEMs, New Jersey Environmental Management System (clientserver application)
- Before 1998 (we called these permits PCP96's and PCP97's)
- These PCPs don't include a complete compliance plan and the renewal invoices are not correct based on the number of equipment
- There were more than 5,000 active PCP 96's and 97's permits
- After taking action, the number of these permits have decreased to 3,620 PCPs 96's and 97's. (28% reduction).

PDF'S APPROVALS GENERATION FOR PCPs AND GPs

- Pre-NJEMs PCPs and some early NJEMS PCPs don't have PDF approvals;
- GPs registered before 2018 don't have PDF approvals;
- The PDF Approvals allow facilities and interested parties to access the permits electronically online (DataMiner or Community Corner).
- The Department had the initiative to create manually the PDF approvals for PCPs and GPs
- 35% of the Project has been completed.

GPS CONTACT INFORMATION AND MASTERFILE

- New functionality for GPs:
 - At the time of registration, there will be a request to confirm the following information:
 - Name and address of Facility
 - Contact information (Responsible Official (RO))
 - Verify there is a complete and accurate RO email address.
 Otherwise the facility won't be able to receive information from DEP; as invoices, PDF approvals, etc.
 - If the information mentioned above is not correct, the Facility will have the option to complete a Non-Tech Amendment.
 - Be sure that the Responsible official contact information is the same as the RO information in the application.

HELPLINES

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