HEALTH RISK ASSESSMENT FOR TITLE V PERMITS

AUTHORITY

- 1. N.J.A.C. 7:27-22.3(cc)
- 2. Permit Application Not Approvable If:
 - a. A violation of an Applicable Requirement, or
 - b. A Contravention of Other Criteria Established
 - i. By Rule, or
 - ii. Pursuant To A Technical Manual

PERMIT MODIFICATIONS

- 1. Modified-Source Risk Assessment
- 2. Use of Health Risk Screening Worksheet
- 3. May Require Refined Risk Assessment
- 4. Discussions with Facility and Internal Stakeholders
- 5. May Require Facility-wide Risk Assessment
- 6. Permit Approved Only if Acceptable Risk

INITIAL OPERATING PERMITS

- 1. Facility-wide Risk Assessment
- 2. Requires Air Dispersion Modeling and Protocol
- Discussions with Facility and Internal Stakeholders
- 4. Permit Approved only if Acceptable Risk

OPERATING PERMIT RENEWALS

- 1. Facility-wide Risk Assessment
- 2. Requires Air Dispersion Modeling and Protocol
- 3. Discussions with Facility and Internal Stakeholders
- 4. Permit May Include Requirement to Submit,
 - a) Within One Year,
 - b) Permit Modification With Risk Minimization Plan (RMP)

RISK MINIMIZATION PLAN (RMP)

- 1. Pollution Prevention Techniques
- 2. Add-on Air Pollution Control Device(s)
- 3. Increase in Stack Height(s)
- 4. Change in Other Stack Parameters
- 5. Reductions in Allowable Emission Rates
- 6. Reduction in Fugitive Emissions
- 7. Technical/Economic Feasibility, If Appropriate

RMP INCORPORATION IN PERMIT

- Review All Control Measures Identified in RMP
- 2. Review Any Technical/Economic Feasibility Analysis
- 3. Review Revised Air Dispersion Modeling
 - Must Show Acceptable Risk
- 4. Appropriate Measures To Be Incorporated in Permit and Compliance Plan

RISK ASSESSMENT FREQUENCY

NJDEP decision based on these factors:

- 1. Since Last Time Risk Assessment Performed,
- 2. Increase in Emissions/New Air Toxic(s)?
- 3. Change in Stack Parameters?
- 4. New Unit Risk Factor(s)?
- 5. New Air Dispersion Model?
- 6. New Sensitive Receptor(s)?
- 7. Public Concern?