



State of New Jersey

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MEMORANDUM

TO: AQPP Permit Evaluators

FROM: John Preczewski, Assistant Director
Air Quality Permitting Program

SUBJECT: Inclusion of Hazardous Air Pollutant (HAP) Emissions in Air Quality Permits

DATE: August 8, 2008

The purpose of this memorandum is to clarify my January 7th memo "Reporting Thresholds for Inclusion in Facility Specific Requirements". Questions have arisen with regard to the reporting of Hazardous Air Pollutant (HAP) Emissions from the storage and combustion of commercial fuels. AQPP staff is directed to include HAP emissions for any equipment or source operation that exceed reporting thresholds in N.J.A.C. 7:27-8 or in N.J.A.C. 7:27-22. These values must be included as limits in the facility specific requirements with the appropriate monitoring recordkeeping and reporting requirements.

After the date of this memo, all draft air quality permits issued must conform to this procedure. Existing permits that do not contain HAP emission limits where HAP emissions for any equipment or source operation that exceed reporting thresholds in N.J.A.C. 7:27-8 or in N.J.A.C. 7:27-22 must be updated as per the following schedule:

1. All equipment or source operations in the emission unit or batch process under modification must be updated as part of the modification application including
 - a. Preconstruction applications submitted pursuant to N.J.A.C. 7:27-8.18, N.J.A.C. 7:27-8.19, N.J.A.C. 7:27-8.20, N.J.A.C. 7:27-8.21 (b) 3 - 8.
 - b. Minor modification and significant modification to operating permits submitted pursuant to N.J.A.C. 7:27-22.23 & N.J.A.C. 7:27-22.24.
2. All equipment in operating permit renewals must be updated as part of the renewal.

Updates on the HAP emission limits must include an evaluation of the health risk impact. State of the Art (SOTA) analysis is not required for equipment or source operation being updated to include HAP emission limits, if it is not undergoing modification as defined in N.J.A.C. 7:27-8.1 or in N.J.A.C. 7:27-22.1

c: W. O'Sullivan, Director Division of Air Quality
AQPP ListServ