



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR, ENERGY AND MATERIALS SUSTAINABILITY
DIVISION OF AIR QUALITY & RADIATION PROTECTION
BUREAU OF STATIONARY SOURCES

PHILIP D. MURPHY
Governor

TAHESHA L. WAY
Lt. Governor

401 East State Street 2nd floor
P.O. Box 420, Mail Code 401-02
Trenton, New Jersey 08625-0420
<https://dep.nj.gov/boss/>

SHAWN M. LATOURETTE
Commissioner

MEMORANDUM

TO: Air Quality Permitting Staff

FROM: Danny Wong, Bureau Chief *DW*

SUBJECT: What Constitutes a Piece of Equipment – N.J.A.C. 7:27-8.2(c)11

DATE: October 10, 2023 (Revised 11/21/2023)

The purpose of this memorandum is to provide guidance for permit evaluations of equipment that falls under N.J.A.C. 7:27-8.2(c)11.

Stationary material handling equipment using pneumatic, bucket or belt conveying systems from which emissions occur.

In discussion with industry representatives and permitting staff, there appears to be some questions on what constitutes a piece of equipment pursuant to N.J.A.C. 7:27-8.2(c)11. This memo is to provide clarification on this issue, specifically what constitutes “conveying system”. The memo is **NOT** meant to cover all cases, as some will still need case by case determination.

Mineral processing facilities usually have these types of sources in different manners. Some are used interchangeably, while others are fixed to a permanent location for only one use. These include conveyors, hoppers, buckets, etc. In determining a “conveying system” as a piece of equipment, one should consider where the transfer point or drop point is located. **It is important to note that the conveyor system should only consist of conveyors and not other types of equipment.**

The clear case is where there are parts that are interchangeable, i.e., moved from one part of the facility to another part of the same facility to be used for multiple purposes. These would be considered stand alone pieces of equipment. For example, a facility has 4 conveyors that are used at different parts of the site. Then, the 4 conveyors would each be designated as a piece of equipment.

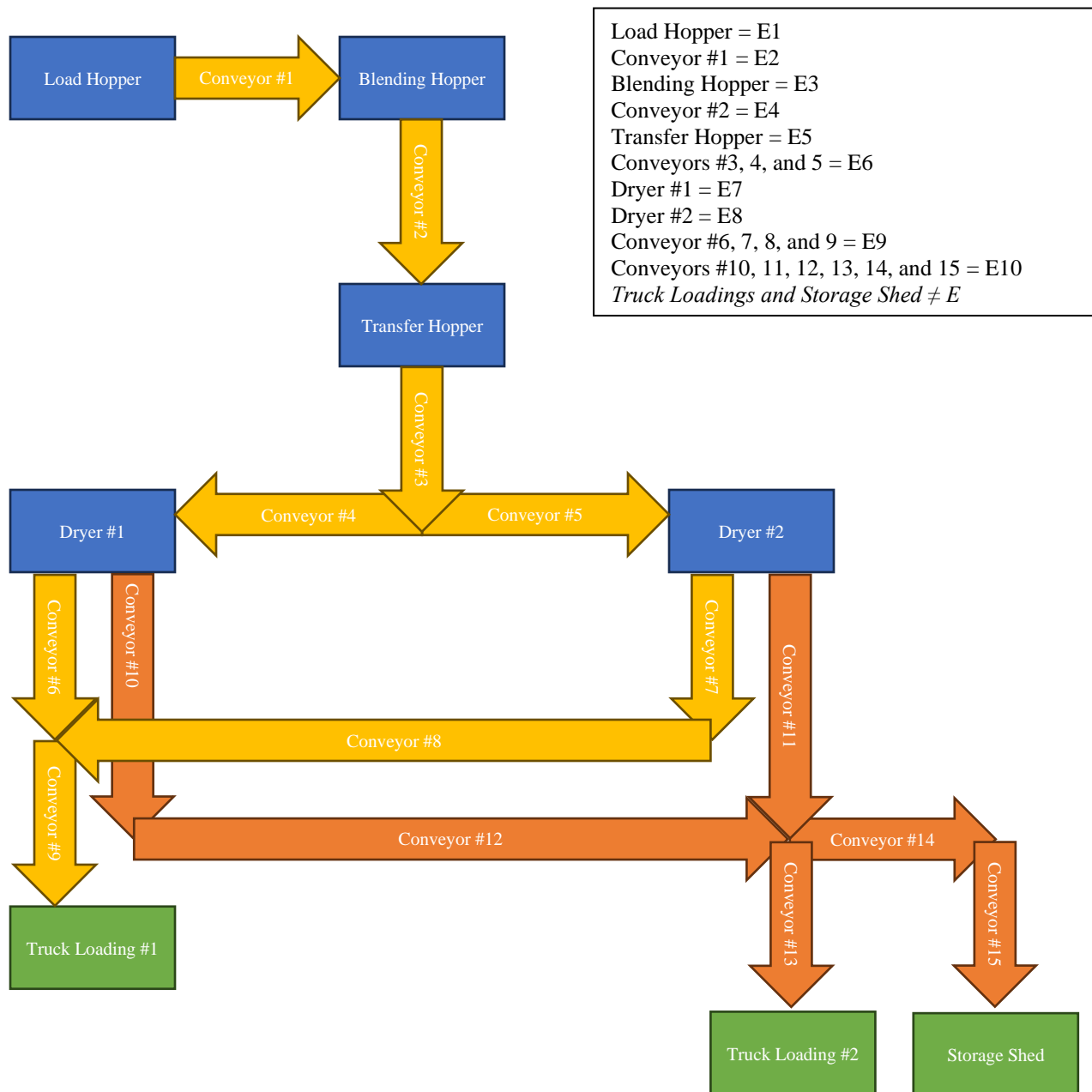
In the case where the conveyors are integrated, not interchangeable, and is not separated by a non-conveyor equipment (i.e., hopper, screener, etc.), then the conveyors can be considered one conveying system. **Attachment A** provides three examples, including flow diagrams.

c: Kenneth Ratzman, Assistant Director



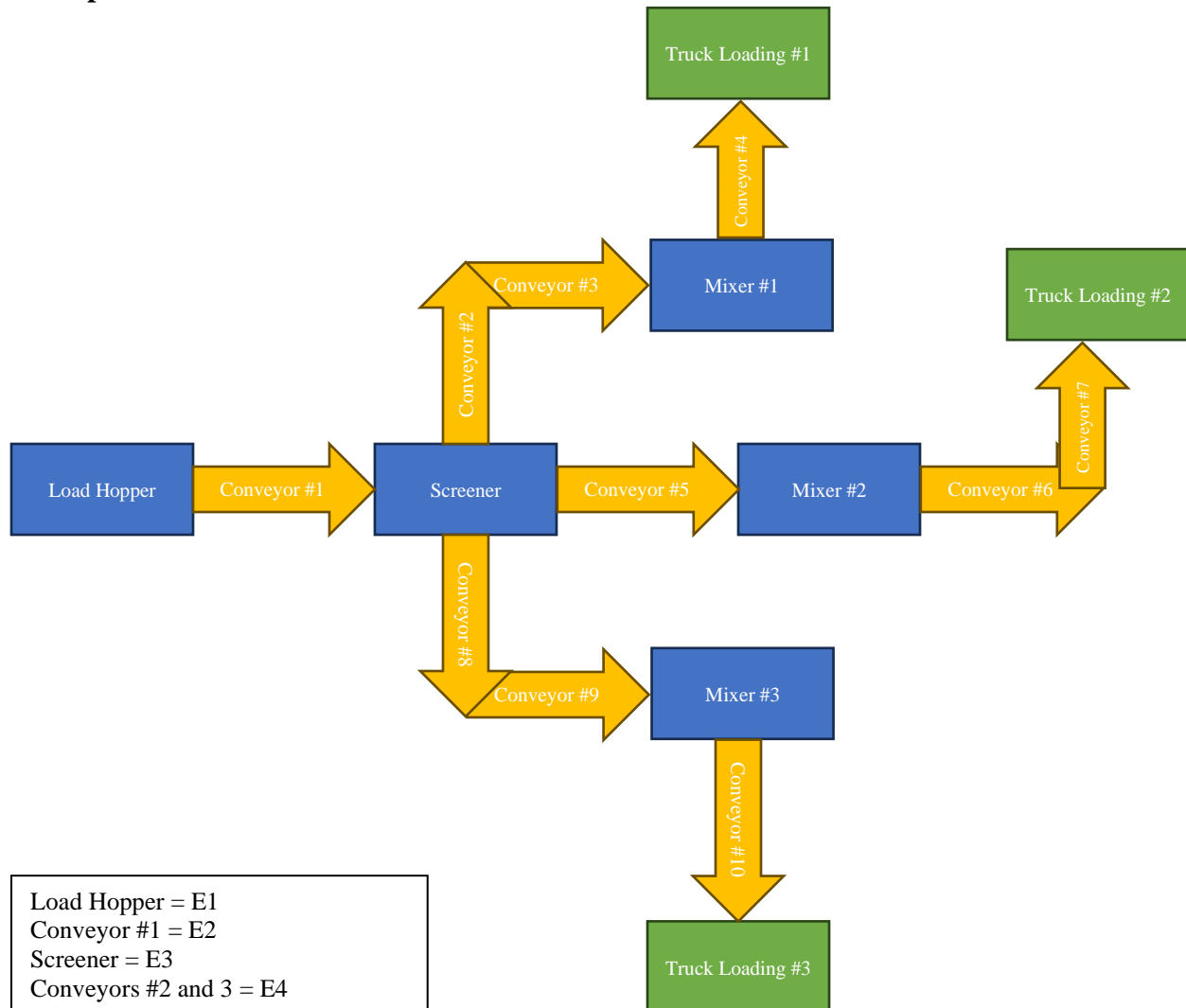
Attachment A

Example 1



Attachment A

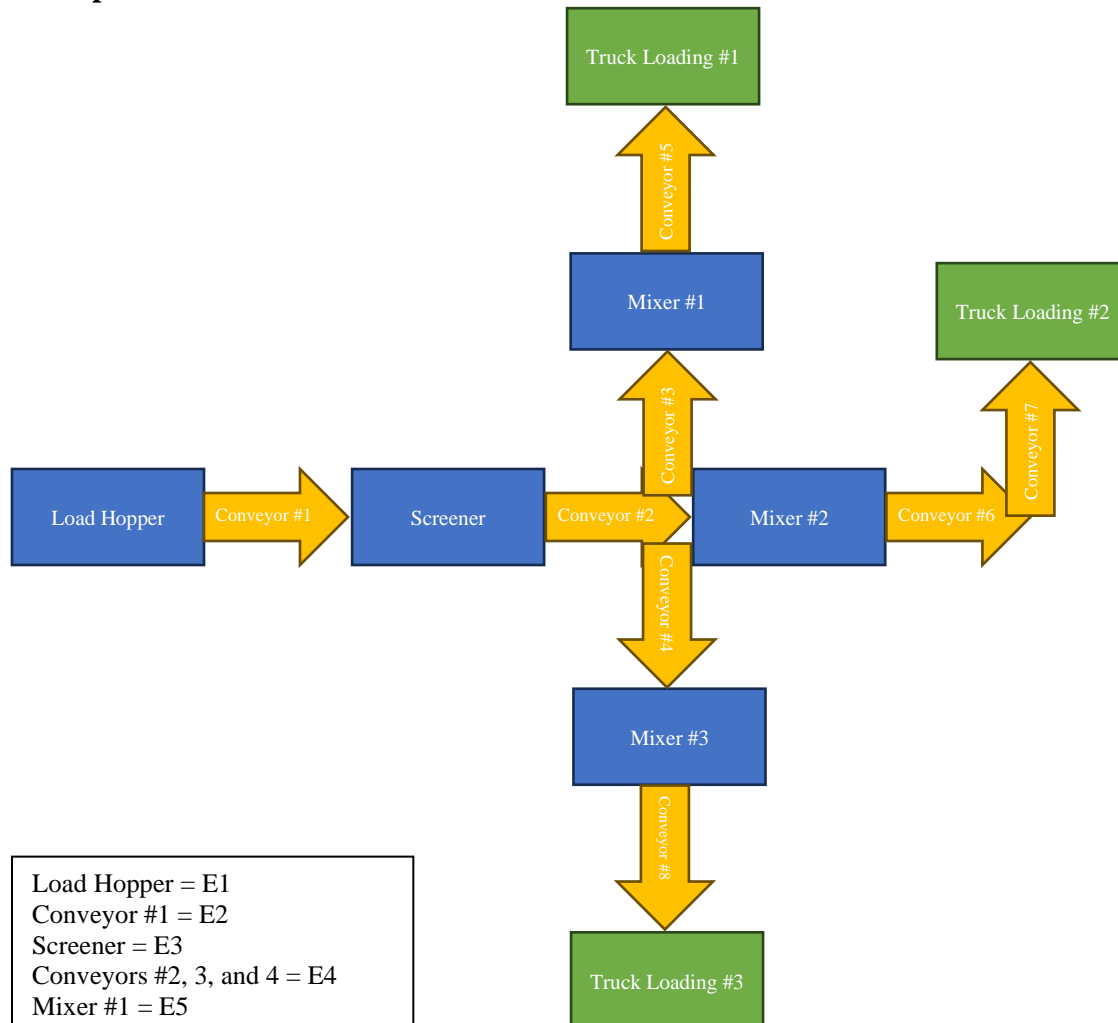
Example 2



Load Hopper = E1
 Conveyor #1 = E2
 Screener = E3
 Conveyors #2 and 3 = E4
 Mixer #1 = E5
 Conveyor #4 = E6
 Conveyor #5 = E7
 Mixer #2 = E8
 Conveyors #6 and 7 = E9
 Conveyors #8 and 9 = E10
 Mixer #3 = E11
 Conveyor #10 = E12
 Truck Loadings ≠ E

Attachment A

Example 3



Load Hopper = E1
 Conveyor #1 = E2
 Screeener = E3
 Conveyors #2, 3, and 4 = E4
 Mixer #1 = E5
 Conveyor #5 = E6
 Mixer #2 = E7
 Conveyors #6 and 7 = E8
 Mixer #3 = E9
 Conveyor #8 = E10
Truck Loadings ≠ E