

State of New Jersey

Jon S. Corzine Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Lisa P. Jackson Commissioner

Division of Air Quality Air Quality Permitting Program 401 E. State Street, PO Box 027 Trenton, NJ 08625-0027

MEMORANDUM

TO: BOP/BPP Permit Writing Staff

FROM: John Preczewski, P.E.

Assistant Director

Air Quality Permitting Program

SUBJECT: Process Monitor Downtime

DATE: October 8, 2008

In accordance with federal regulations as defined in the CAM Rule, the Department is providing the following guidance for interpreting the requirements to implement monitoring, reporting, and compliance certification for process monitors.

Applicability

Owners and/or operators of any permitted source operation that is required by the Department to demonstrate compliance using a non-certified process monitor.

Definitions:

Process Monitor (PM): a permit required non-certified device that monitors, senses, and records (a) process parameter(s). Examples include, but are not limited to, the following: scrubber flowrate monitors, temperature monitors, feed rate monitors.

Service outage time: Time the process monitor is not operating while the permitted process is operating. This may also be referred to as downtime or when data is not available. This includes but may not be limited to quality assurance, routine maintenance activities, and other periods of downtime.

Requirements:

The following operational and notification requirements must be complied with:

Process monitors must be operated at all times when the associated process equipment is operating except during service outage time not to exceed 24 hours per calendar quarter.

The owner and/or operator must keep a service log on all process monitors and maintain a current summed quarterly service outage time in minutes. The log must include the date, time and length the PM was out of service. If the process monitor exceeds the quarterly service outage time the owner and/or operator must note the exceedence in the service log and notify the Regional Enforcement Office. A facility shall not use the PM downtime as a shield of a known violation of an emission standard or create an N.J.A.C. 7:27-5 violation.

Permits issued to facilities that have a PM shall not generally include requirements to submit a quality assurance program (protocol) approved by the Department.

Effective Date: 10/10/08