

STATEMENT OF BASIS for Monmouth University
TITLE V OPERATING PERMIT SIGNIFICANT MODIFICATION
Program Interest (PI): 21323 / Permit Activity Number: BOP220001

I. FACILITY INFORMATION

Monmouth University is located at 400 Cedar Avenue, West Long Branch NJ 07764-1898, Monmouth County and is an institution of higher learning. The facility is owned by Monmouth University and is operated by Monmouth University.

The facility is classified as a major facility based on its potential to emit 36.5 tons per year of nitrogen oxides to the atmosphere.

This permit does not contain any hazardous air pollutants.

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility includes: Fifty-two natural gas boilers, 3 boilers using dual fuel, three emergency generators firing fuel oil, and one gasoline storage tank.

A Facility-Wide Risk Assessment will be conducted during the next Operating Permit Renewal process. Health Risk Assessment was not conducted with this permit modification since no changes were made to Air Toxics (including HAPs) emissions.

This is a Permit Modification and includes the following changes:

Monmouth University is removing equipment: Equipment E2501, Emissions Unit U25, and Emission Point PT25 a 2,000-gallon gasoline Above Ground Storage Tank (AST) and adding a new, 2,000-gallon gasoline AST labeled U50/E50/PT50.

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This modification will also change the facility-wide emission limits as listed in the following table:

Allowable Emission Limits	Facility's Potential Emissions (tons per year) *									
	VOC (total)	NO _x	CO	SO ₂	TSP (total)	PM ₁₀ (total)	PM _{2.5} (total)	Pb	HAPs (total)	CO ₂ e (total)
Current Permit	1.42	36.5	24.5	27.4	2.35	2.35	NA	NA	NA	60,168
Proposed Permit	1.58	36.5	24.5	27.4	2.35	2.35	NA	NA	NA	60,168
Change (+ / -)	+0.16	0	0	0	0	0	NA	NA	NA	0

VOC Volatile Organic Compounds

NO_x Nitrogen Oxides

CO Carbon Monoxide

SO₂ Sulfur Dioxide

TSP Total Suspended Particulates

* Other Any other air contaminant regulated under the Federal Clean Air Act. This permit does not contain any air pollutants under this category.

PM₁₀ Particulates under 10 microns

PM_{2.5} Particulates under 2.5 microns

Pb Lead

HAPs Hazardous Air Pollutants

CO₂e Carbon Dioxide equivalent

IV. CASE-BY-CASE DETERMINATIONS

No case-by-case determinations were required for this modification.

V. EMISSION OFFSET REQUIREMENTS

This modification is not subject to Emission Offset requirements.

VI. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

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Storage Tank

For aboveground storage tank U50, the facility monitors the total throughput \leq 30,000 gallons of gasoline for any 12 consecutive months for the long-term (TPY) and short term (lb/hr) emission limits for VOC. The facility also monitors the total throughput \leq 10,000 gallons of gasoline in any month for the long-term (TPY) and short term (lb/hr) emission limits for VOC.

3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
- Equipment size and capacity limitations,
 - Subject equipment being permitted at the maximum rated capacity,
 - There is no specific state or Federal standard that applies to this piece of equipment,
 - Not a pollutant of concern for this piece of equipment,
 - Agreements with EPA on the frequency of testing and monitoring for combustion sources.

Based on the above criteria, there is no direct or surrogate monitoring.

VII. APPLICABLE STATE AND FEDERAL RULES

This modification is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at: <http://www.nj.gov/dep/aqm/rules27.html>

This modification is also subject to Federal regulations listed below.

MACT Subpart A	General Provisions
NESHAPS 40 CFR 60,63	MACT Subpart CCCCCC

The Greenhouse Gas (GHG) emissions from this facility are 60,168 TPY CO₂e and there is no GHG emissions increase. This modification is not subject to PSD rules at 40 CFR 52.21.

VIII. FACILITY'S COMPLIANCE STATUS

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

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Prior to the expiration of the Operating Permit's five-year term, the facility will be required to apply for a renewal, at which time the Department will evaluate the facility and issue a public notice with its findings.

IX. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

FACILITY NAME (FACILITY ID NUMBER)
BOP050001

Activity Number assigned
by the Department

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit Number
assigned by the Facility

Brief description of
emission unit

Emission Unit: U40 Sewage Sludge Incinerators
Operating Scenario: OS Summary

OR

OS2 Fluidized Bed Incinerator

OS Summary lists all rules and requirements
that apply to an emission unit. An emission unit
may contain one or more pieces of equipment
and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules
and requirements that apply to a scenario. An operating
scenario represents various ways (or scenarios) a piece of
equipment is permitted to operate.

Item
Number

Description of applicable
requirement

Monitoring method to
ensure compliance

Recordkeeping to show
facility's compliance

Actions and submittals
required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for
applicable requirement

Rule citation for
monitoring requirement

Rule citation for
recordkeeping requirement

Rule citation for submittal/
action requirement

Explanation Sheet for Facility Specific Requirements