



**New Jersey Department of Environmental Protection**

# **Attachment to the RADIUS Operating Permit Renewal Application**

Revised Jan 25, 2011

This package must be submitted as an attachment to the RADIUS Operating Permit Renewal Application. The forms contained in this package must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

**Bureau of Air Permits  
New Jersey Department of Environmental Protection  
401 East State Street, 2<sup>nd</sup> Floor, Box 420, Mail Code 401-02, Trenton, NJ 08625-0420**

**Operating Permits Helpline 609-633-8248**

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## **Applying for an Operating Permit Renewal**

The Bureau of Air Permits has prepared this summary to assist you in renewing an operating permit. The summary includes the contents of the operating permits rule, and the administrative procedures utilized for the renewal of an operating permit.

To continue lawful operation of a facility that has obtained an approved operating permit, a permittee must initiate the renewal of the operating permit by submitting a timely and administratively complete application. A complete operating permit renewal application consists of the RADIUS Operating Permit Renewal application forms and all forms contained in this package, along with any supporting documents (if needed).

### **Timely**

To be considered timely, the Department must receive an administratively complete renewal application at least 12 months prior to expiration of the operating permit. The applicant is encouraged to voluntarily submit the renewal application at least 15 months prior to expiration of the operating permit, so that any deficiencies in the application may be addressed prior to the application due date. Only applications, which are administratively complete by the application deadline, will be eligible for coverage by an application shield.

N.J.A.C. 7:27-22.30(c)

### **Administratively Complete**

To be deemed administratively complete, an application for renewal of an operating permit shall include all information requested in the RADIUS Operating Permit Renewal application forms and all forms contained in this package.

N.J.A.C. 7:27-22.30(d)

### **Application Shield**

The Department may grant an application shield when a timely and administratively complete application is received. An application shield allows the facility to continue operations (as the approved operating permit allows) while the renewal application is being reviewed, even if the review extends beyond the expiration date of the approved permit. Unless a facility obtained an application shield, the right to operate the facility terminates upon the expiration of its operating permit.

N.J.A.C. 7:27-22.30(g) and (i)

### **Changes in Operations Allowed by the approved Operating Permit**

Changes made to the facility that are consistent with the 7-day notice provisions, and changes made to insignificant source operations must be described in the renewal application. Standard forms are included in the RADIUS Operating Permit Renewal application and in this package to assist the applicant.

N.J.A.C. 7:27-22.30(d)

### **Changes in Operations not Allowed by the approved Operating Permit**

A facility may simultaneously include separate applications to make changes at the facility that qualify as significant modifications, minor modifications, or administrative amendments. The Department at its discretion may include approval of these proposed changes along with the approval of the renewal application. The Department intends to approve such changes along with the renewal, however, there may be some circumstances where the review of the changes may take longer than the review of the renewal application. In these circumstances, the Department may choose to not hold up the issuance of the renewal, and approve the requested changes separately.

N.J.A.C. 7:27-22.30(d)

### **Assistance in completing the application forms**

The Department offers assistance to help you understand the application forms and the information requests therein. Assistance may be obtained by calling the Operating Permits Helpline at 609-633-8248.

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

## Attachment to the RADIUS Operating Permit Renewal Application

### Section 1 Compliance Requirements

#### Operating Permit Rule Requirements

**As required by N.J.A.C. 7:27-22.9(c) 3 and (4)**

1. Facility must be in compliance with all applicable requirements of the compliance plan and should continue to comply with all applicable requirements of the compliance plan, except those specifically listed in a compliance schedule.

**As required by N.J.A.C. 7:27-22.9(c) 6.i**

2. Facility must comply with the accidental release provisions at 42 U.S.C. Section 7412(r) and N.J.A.C. 7:31."

**As required by N.J.A.C. 7:27-22.9(c) 6.iii**

3. Any architectural coating used at this facility must conform with the standards set forth at N.J.A.C. 7:27-23.

#### Compliance Assurance Monitoring (CAM) Requirements

EPA developed 40 CFR 64 (Compliance Assurance Monitoring or "CAM") in order to provide reasonable assurance that facilities comply with emission limitations by monitoring the operation and maintenance of their control devices. In general, CAM applies to emission units that meet all of the following conditions:

- the emission unit is located at a major source for which a Title V permit is required; and
- the emission unit is subject to an emission limitation or standard for a specific contaminant; and
- the emission unit uses a control device to achieve compliance with that specific contaminant's federally enforceable limit or standard; and
- the emission unit has potential pre-control or post-control emissions (of that specific contaminant) of at least 100% of the major source amount (see 40 CFR 64.2 - "Major facility"); and
- the emission unit is not otherwise exempt from CAM (for exemptions, see 40 CFR 64.2(b)).

To learn more about the CAM program, check EPA's website: [www.epa.gov/ttn/emc/cam.html](http://www.epa.gov/ttn/emc/cam.html).

After reviewing the information above, check one of the following boxes:

**NO**, my facility DOES NOT have any emission units subject to CAM requirements.

**YES**, my facility DOES have one or more emission units subject to CAM requirements and a CAM plan is provided with the operating permit renewal application.

Guidance on how to prepare a CAM plan can be found at EPA's website: [www.epa.gov/ttn/emc/cam.html](http://www.epa.gov/ttn/emc/cam.html).

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## **Attachment to the RADIUS Operating Permit Renewal Application**

THIS SECTION APPLIES ONLY TO FACILITIES SUBJECT TO EPA'S ACID RAIN PROGRAM  
(40 CFR 72)

### **Acid Rain Program**

To learn more about Acid Rain Program, check EPA's website: <http://www.epa.gov/airmarkets/arp/>.

Check one of the following boxes:

There have been no changes affecting my facility's Acid Rain Permit.

There have been changes affecting my facility's Acid Rain Permit and a revised/updated application is provided with the operating permit renewal application.

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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 2**  
**Certification**

**Facility Name:** \_\_\_\_\_ **PI Number:** \_\_\_\_\_

**Certification**

Responsible Official as Defined in N.J.A.C. 7:27- 1.4

1. "I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this attachment to the RADIUS Operating Permit Renewal Application and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information."

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
PRINT OR TYPE NAME

\_\_\_\_\_  
TITLE

Individuals (may include consultants) with direct knowledge of and responsibility for the information contained within this document as defined in N.J.A.C. 7:27-1.4

2. "I certify, under penalty of law, that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine and imprisonment or both, for submitting false, inaccurate or incomplete information."

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
PRINT OR TYPE NAME

\_\_\_\_\_  
AFFILIATION - TITLE

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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 3**  
**A Summary of 7-day Notice Changes**

**Instructions**

Complete this form if any 7-day notices were sent to the NJDEP since the approval of this operating permit. With this information, the NJDEP will include the provisions of any eligible 7-day notice changes into the renewed permit.

<b>No.</b>	<b>Date of 7-Day Notice</b>	<b>Brief Description of Change</b>

**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 4  
A Summary of the results from Testing and Monitoring**

**Instructions**

Complete this form if the permit required emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance	
						Yes	No

Make additional copies of this form if needed.

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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 5**  
**Compliance Status**

**Instructions**

1. Subject Item: List each subject item from Section G, Compliance Plan and Inventories, of the operating permit in this column. Subject items include Facility (FC), Group (GR), Non-Source Fugitive Emissions (FG), Insignificant Source (IS), Batch Process (BP), and Emission Unit (U). (Reference numbers are required only for Non-Compliance permit requirements. See item 2 below).
2. Compliance Status: Provide compliance status for each subject item in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "In Compliance". If one or more permit requirements are out of compliance for a particular subject item, provide the reference number for each out of compliance requirement in the first column and write "Non-Compliance" in the 2<sup>nd</sup> column. (Reference numbers for each applicable requirement are located in the first column of Facility Specific Requirements, Section G of the permit).
3. Method used to determine compliance: Describe how compliance was determined in this column.
4. For the last column, insert a "No" if there are no schedules included in this application to address non-compliance issues in either the current permit , or if "Non-Compliance" was inserted in the 2<sup>nd</sup> column. Insert a "Yes" if a compliance schedule is included in this renewal application to address non-compliance issues in the approved permit, or non-compliance issues disclosed in this application.

**1**

**2**

**3**

**4**

Subject Item	Compliance Status	Method used to determine Compliance	Is a Compliance Schedule attached? (Yes/No)
Reference Number	(In Compliance Non- Compliance)		

**This is a sample form for instructions only. Use the form provided on page 9.**

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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 5  
Compliance Status**

**Instructions**

Read the instruction on page 8 before completing this form.

<b>Subject Item</b>	<b>Compliance Status (In Compliance Non- Compliance)</b>	<b>Method used to determine Compliance</b>	<b>Is a Compliance Schedule attached? (Yes/No)</b>
<b>Reference Number</b>			
<i>Subject Item</i>			
<i>Reference No.</i>			
<i>Subject Item</i>			
<i>Reference No.</i>			
<i>Subject Item</i>			
<i>Reference No.</i>			

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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 5  
Compliance Schedules**

**Instructions**

Complete this form if the permit included any compliance schedules (Section G of the permit) or if there are any non-compliance issues at the time of completing this application form.

Subject Item	Requirement	Compliance Schedule	Compliance Schedule		
			Updated	Removed	Added
<i>Subject Item</i>					
<i>Reference No.</i>					
<i>Subject Item</i>					
<i>Reference No.</i>					
<i>Subject Item</i>					
<i>Reference No.</i>					

Make additional copies of this form if needed.

## Attachment to the RADIUS Operating Permit Renewal Application

### **Section 6** **Pollution Prevention Reporting**

#### **Description**

The following evaluation requirements are included to track the facility's progress in several critical areas identified in the National Environmental Performance Partnership System (NEPPS). Nitrogen Oxides (NOx) and Volatile Organic Compounds (VOC) are precursors to the air pollutant Ozone, for which New Jersey is non-attainment with the air quality standard for the protection of public health. The control of Hazardous Air Pollutants (HAPs) is also a focus item for the next decade in order to minimize localized hot spots and general urban air toxics levels. Therefore, the Department is requiring evaluation of emission trends at 5-year intervals for major sources of these air contaminants.

The evaluation of these trends requires no increased monitoring. Rather it utilizes existing monitoring data, as reported annually in Emission Statements (NOx and VOC) and annual Release and Pollution Prevention Reports (HAPs). The intent of this evaluation is to better utilize the existing data by having the company, the public and the Department review major source trends periodically, as part of the 5-year renewal review and the public comment process. The Department requests that the facility-wide trends be presented on graphs for attachment to the public information document for the 5-year renewal.

Pollution prevention includes changes that result in the reduction in use or generation of non-product output per unit of product. Cross media effects are practices that result in transferring the ultimate release or disposal of a contaminant from one environmental medium (e.g. air) to another environmental medium (e.g. water, solid or hazardous wastes).

#### **Information to include with a renewal application**

1. The facility will evaluate annual emission trends over the last five years for actual air contaminant emissions of Volatile Organic Compounds (VOC), Nitrogen Oxides (NOx), if the facility's potential to emit VOC or NOx is greater than 25 tons per year, or any Hazardous Air Pollutants (HAP), for which the facility's potential to emit is greater than 10 tons per year. The VOC and NOx emission data should reflect annual emission statement reports submitted pursuant to N.J.A.C. 7:27-21, and the HAP emissions data should reflect the annual Release and Pollution Prevention Report submitted pursuant to N.J.A.C. 7:1G-4 and 5 and N.J.A.C. 7:1K-6. This attachment includes forms for reporting the annual emission trend data. Sample graphs representing facility-wide trends are included.

Although not required, the Department encourages the facility to explain the reason for any significant trend, including whether it is the result of cross media shifts (to air, water, or solid waste) and/or pollution prevention. Changes should be itemized for each emission unit (or process) with a potential to emit over five tons per year of VOC or NOx or a potential to emit over one ton per year of any HAP. Also, show the net change for the facility.

2. The facility will summarize annual potential to emit limits (allowable emissions) for VOC, NOx, and HAPs, which are subject to reporting under 1 above, for the last five years. Changes should be itemized for each emission unit (or process) with a potential to emit over five tons per year of VOC or NOx or a potential to emit over one ton per year of any HAP. Also, show the net change for the facility. This attachment includes forms for reporting the annual emission trend data.
3. The facility will summarize changes in potential and actual VOC, NOx and HAPs emissions for insignificant sources, which are subject to reporting under 1 above. Also, show the net change for the facility.

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## **Attachment to the RADIUS Operating Permit Renewal Application**

4. The facility will discuss 5-year trends in actual air contaminant emissions of non-source VOC and HAP fugitives, which are subject to reporting under 1 above; explain measures taken to minimize such fugitives; and provide an explanation for any significant changes.
5. The facility will summarize 5-year trends in annual VOC, NO<sub>x</sub>, and HAP emissions, which are subject to reporting under 1 above, on a pound per unit of product basis, based on annual actual emissions and annual production over the 5-year period. Changes should be itemized for each emission unit (or process) with a potential to emit over five tons per year of VOC or NO<sub>x</sub> or a potential to emit over one ton per year of any HAP. Also, show the net change for the facility. See sample chart and graph.

### **General Instructions**

For the forms in this section, the following definitions may assist you in filling out the requested information.

Year: means the calendar year.

5-year Interval: means the five complete calendar years prior to the year the renewal application is due. For example, if the renewal application was due in November of 2004, the 5-year interval will be the calendar years 1999, 2000, 2001, 2002, and 2003.

Potential to Emit (PTE): means the emission rates specified in Section C of the approved operating permit. This can also be known as allowable emissions. The PTE may change each year as modifications to the operating permit are approved. When modifications to the operating permit are approved, please report the values from Section C of the permit from the last approved modification for that year.

Actual Emissions: air contaminant emissions (tons per year) from annual emission statement reports submitted pursuant to N.J.A.C. 7:27-21, and the HAP emissions data from the annual Release and Pollution Prevention Report submitted pursuant to N.J.A.C. 7:1G-5 and 6 and N.J.A.C. 7:1K-6.

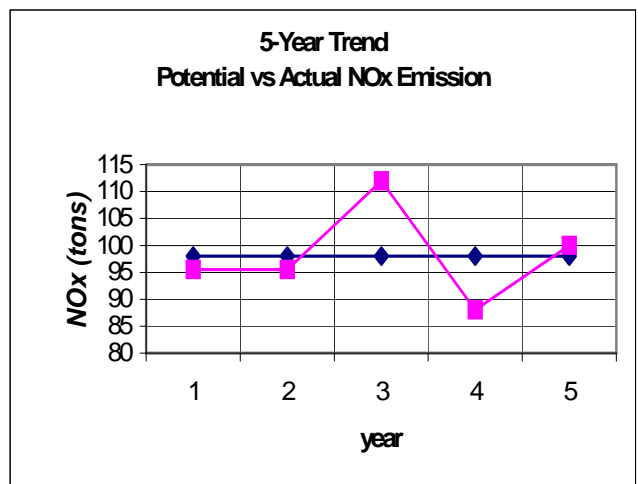
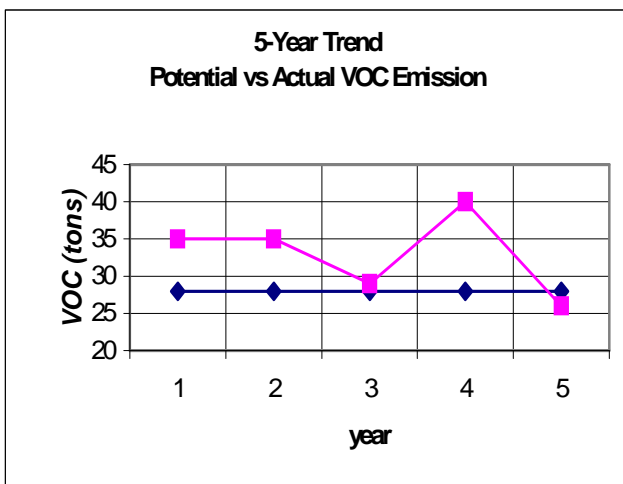
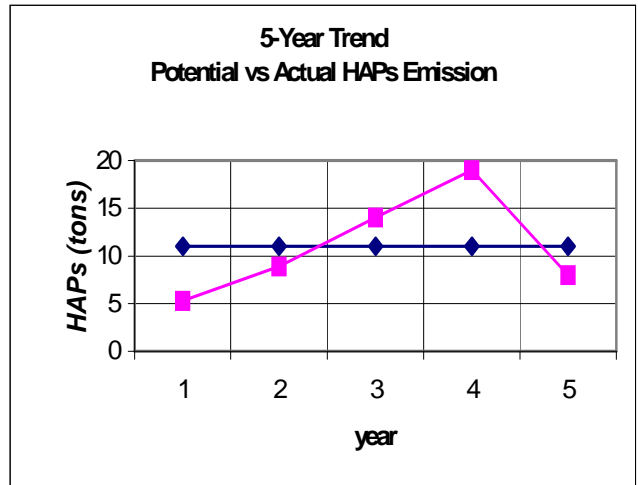
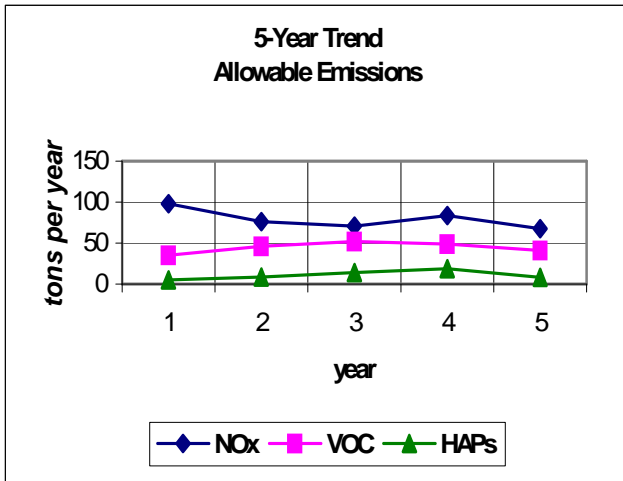
Emission Unit: means the same emission units as in the approved operating permit. A list of emission units is included in Section K, Inventories, of your operating permit.

Net Change: means the difference (increase or decrease) in the emissions over the time period under consideration. For example, if the facility's potential to emit or allowable emission increased from 25 tons in 1995 to 30 tons in 1996, the net change is 5 tons.

Attachment to the RADIUS Operating Permit Renewal Application

**Section 6**  
**Facility Wide Trends**

Sample Charts



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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 6  
Changes to VOC Emissions for Emission Units**

Emission Unit Number		VOC Potential and Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
<b>Totals</b>	<i>Potential</i>					
	<i>Actual</i>					
<b>Net Change</b>	<i>Potential</i>					
	<i>Actual</i>					

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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 6  
Changes to NOx Emissions for Emission Units**

Emission Unit Number		NOx Potential and Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
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	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
<b>Totals</b>	<i>Potential</i>					
	<i>Actual</i>					
<b>Net Change</b>	<i>Potential</i>					
	<i>Actual</i>					

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**Section 6**  
**Changes to HAP Emissions for Emission Units**

Emission Unit Number And HAP Compound		HAP Potential and Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
<b>Totals</b>	<i>Potential</i>					
	<i>Actual</i>					
<b>Net Change</b>	<i>Potential</i>					
	<i>Actual</i>					

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**Section 6  
Changes to Insignificant Source Emissions**

		VOC Potential and Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
<b>Totals</b>	<i>Potential</i>					
	<i>Actual</i>					
<b>Net Change</b>	<i>Potential</i>					
	<i>Actual</i>					

		NOx Potential and Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
<b>Totals</b>	<i>Potential</i>					
	<i>Actual</i>					
<b>Net Change</b>	<i>Potential</i>					
	<i>Actual</i>					

HAP Compound		HAP Potential and Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
	<i>Potential</i>					
	<i>Actual</i>					
	<i>Potential</i>					
	<i>Actual</i>					
<b>Totals</b>	<i>Potential</i>					
	<i>Actual</i>					
<b>Net Change</b>	<i>Potential</i>					
	<i>Actual</i>					

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**Section 6  
Changes to Non-Source Fugitive Estimated Emissions**

		VOC Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
<b>Total</b>	<i>Actual</i>					
<b>Net Change</b>	<i>Actual</i>					

		NOx Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
<b>Total</b>	<i>Actual</i>					
<b>Net Change</b>	<i>Actual</i>					

HAP Compound		HAP Actual Emissions (tons per year)				
		Year 1	Year 2	Year 3	Year 4	Year 5
	<i>Actual</i>					
	<i>Actual</i>					
	<i>Actual</i>					
	<i>Actual</i>					
<b>Total</b>	<i>Actual</i>					
<b>Net Change</b>	<i>Actual</i>					

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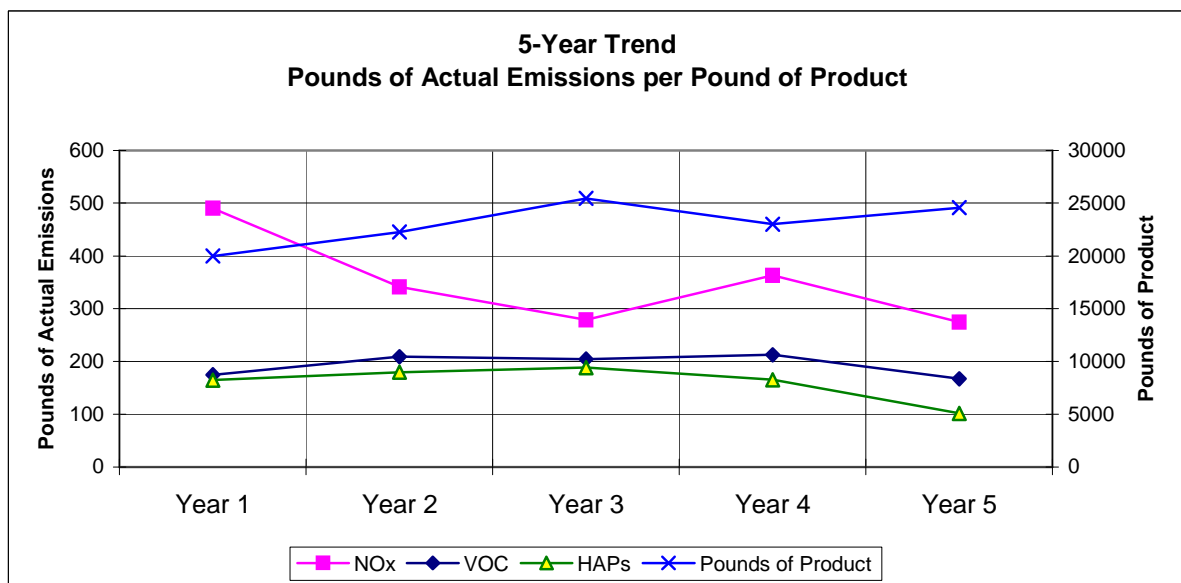
**Section 6  
Emissions on Pound per Unit of Product Basis**

Summarize 5-year trends in annual VOC, NOx, and HAP emissions on a pound per unit of product basis, based on annual actual emissions and annual production over the 5-year period. Changes should be itemized for each emission unit (or process) with a potential to emit over five tons per year of VOC or NOx or a potential to emit over one ton per year of any HAP. Also, show the net change for the facility.

Air Contaminant	Actual Emissions (pounds per year)				
	Year 1	Year 2	Year 3	Year 4	Year 5
VOC (pounds per year)					
NOx (pounds per year)					
HAPs (pounds per year)					
Pounds of Product					

<b>Net Change</b>	Year 1 and 2	Year 2 and 3	Year 3 and 4	Year 4 and 5
VOC (pounds per year)				
NOx (pounds per year)				
HAPs (pounds per year)				
Pounds of Product				

**Sample Chart**



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**Attachment to the RADIUS Operating Permit Renewal Application**

**Section 6**  
**5-year Trends**

Although not required, the Department encourages the facility to explain the reason for any significant trend, including whether it is the result of cross media shifts (to air, water, or solid waste) and/or pollution prevention. Changes should be itemized for each emission unit (or process). Also, show the net change for the facility.