

General Permits and Permits-by-Rule: When Less is Better



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What is a General Permit?

- Registration-like process
- Pre-approved (no agency review)
- Simple/common source categories
- Fixed set of pre-defined permit conditions
- Non-negotiable
- Optional

Why General Permits?

- Provide consistency and predictability to the regulated community and public
- Provide convenient, expanded services to the regulated community
- Gain environmental benefits without the need to review individual permits
- Shift permit review from simple sources to more complex sources
- Rapid turnaround at lower cost

General Permits in NJ

- Single Boilers (<10 MMBTU/hr) (5739)
- Storage/Transfer of Service Station Fuels (Stage 1 and 2 Vapor Recovery) (3417)
- Emergency Generators (2756)
- Multiple Boilers/Heaters (<10 MMBTU/hr individually) (1208)
- Bulk Solid Materials Receiving & Storage (523)

General Permits in NJ

- Remediation of Subsurface Gasoline Contamination at Fueling Stations (314)
- Perchloroethylene Dry Cleaning (298)
- Non-Floating Roof VOC Storage Tanks (221)
- Confined Abrasive Blasting (103)
- Non-HAP Dry Cleaning (85)
- Storage/Transfer of Service Station Fuels (Stage 1 Only) (68)

General Permits in NJ

- Woodworking Equipment (39)
- Boilers (10-50 MMBTU/hr) (18)
- Non-HAP VOC Degreasers (7)
- MACT Degreasers (new)
- “Small Emitters” (SEGAP) (new)
- Research & Development Activities (new)
- Non-MACT Electroplating (new)
- Title V “Small Emitter” General Permit (new)

New GPs Under Development

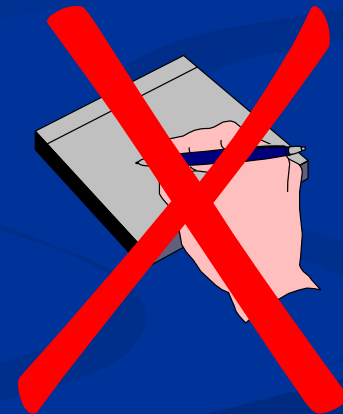
- Portable Stationary Sources
- Soil Screeners
- Plastic Extruders

How to File

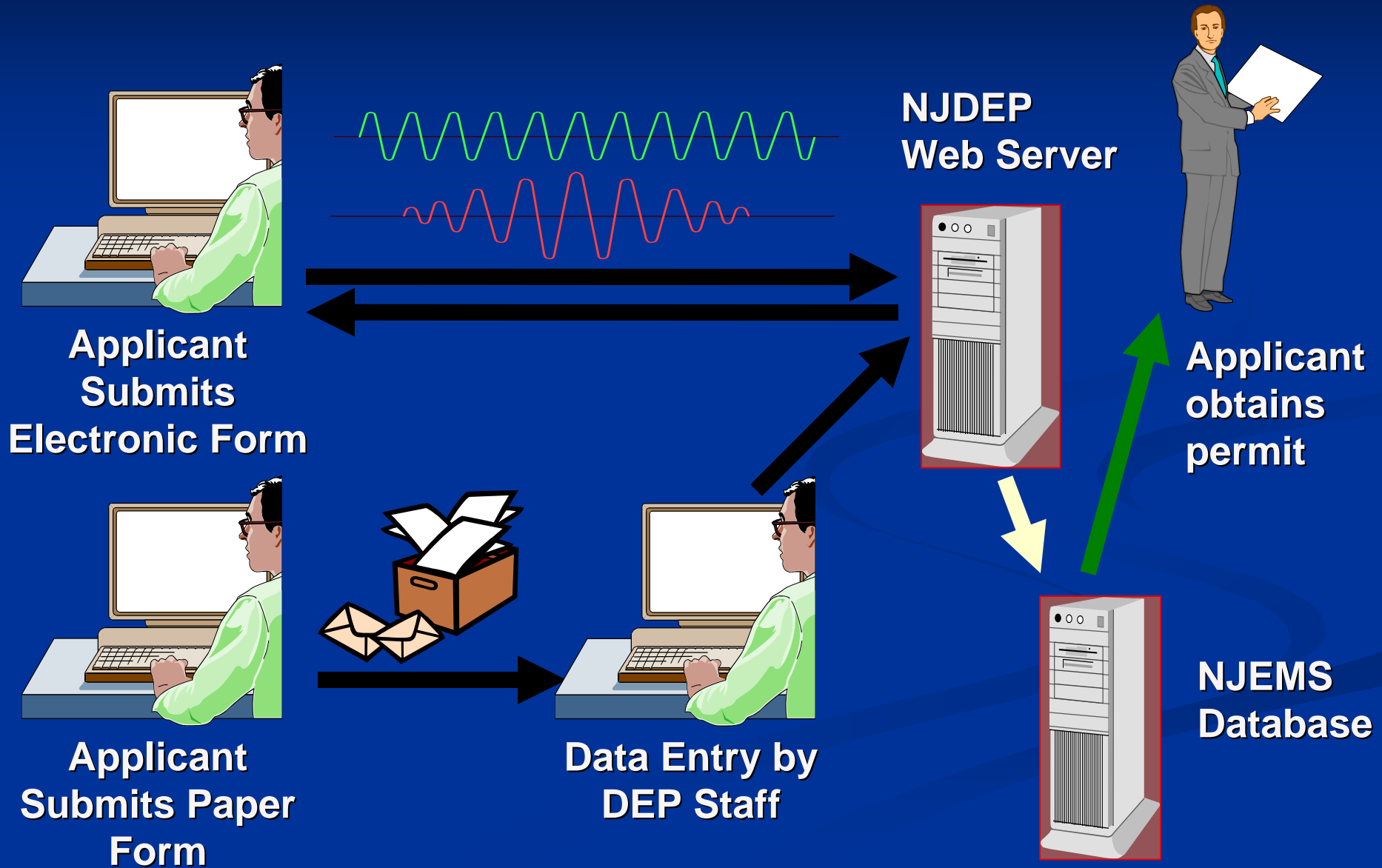
- Internet (www.njdeponline.com)



- Paper (strongly discouraged)



Process Schematic



Lessons Learned

- Only ~20% of GPs were submitted electronically last year. Why?
 - Paper form is just as simple as the web form
 - Financial incentive to file electronically
 - Mandatory electronic submission after 1/1/2010 (1/1/2008 for Title V GPs)
 - Electronic applications must be paid by credit card or electronic funds transfer
 - A “Bill Me Later” function will be added soon

Financial Incentives

- GP fees << Air permit fees
- Electronic GP fees < Paper GP fees
- Example: 10 year fees for a gas station with 3 storage tanks (1 initial permit & 1 renewal)

Regular Permit \$3300

Paper GP \$850

Electronic GP \$700

Keys to Success

- Start with a high volume, simple process
- Keep it simple (design for 99%, not 100%)
- Make it secure
- Constituent involvement
- Make it easier and faster than paper
- Improve upon existing processes

More Keys to Success

- Post-Implementation
 - Incentives
 - Training
 - Marketing
 - Help Line