

Doday EJIF 2012 Stats Combustion Adjustments Waste Oil Heaters Emergency Generators Value EJIF Policies EJIF Claims Overview Underground Storage Tanks Construction Dewatering Industrial Stormwater

NJUA EJIF STATS 2012 • 74 Member UAs • 847 Pump Stations & Wells • 745 Emergency Generators • 667 Petroleum ASTs • 372 Non-Petroleum ASTs • 69 Petroleum USTs



Combustion Adjustments

Applicability

- · All Boilers 5.0 Million Btu/hr and larger
- · Natural Gas and Fuel Oil fired boilers both require adjustments

By the end of 2012:

1. Conduct Adjustments (Including Before & After Readings)

www.nj.gov/dep/aqpp/adjustment.htm

1. 45 Days after Testing: Submit results to NJDEP of Annual Combustion Adjustment via

www.state.nj.us/dep/online/

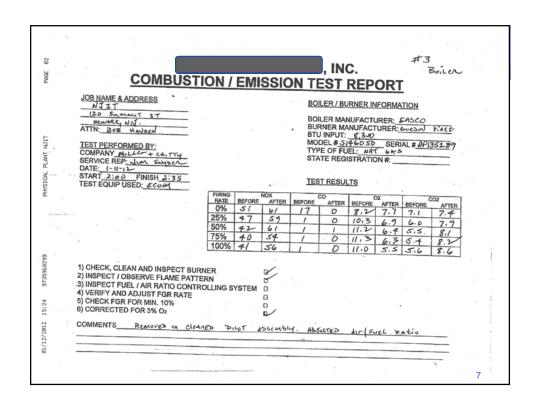


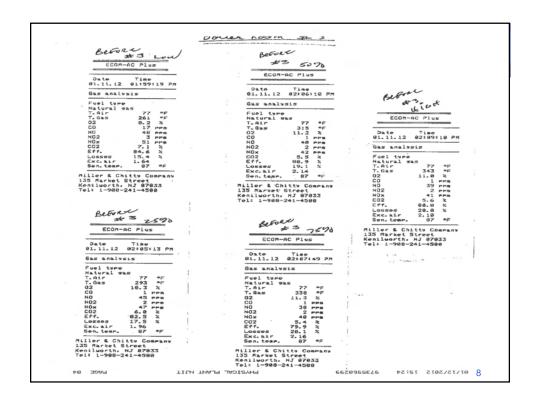
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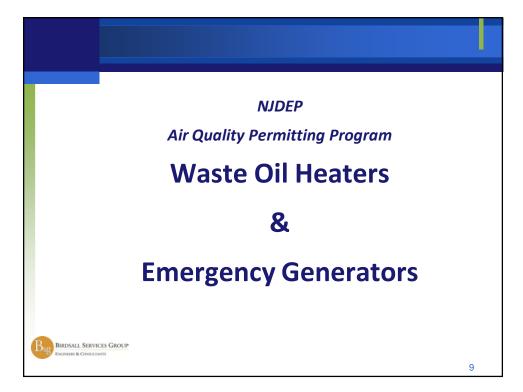
Combustion Adjustments

- 1. Obtain a MyNJ Account
 - http://www.nj.gov
- 2. Obtain a NJDEP Online User ID
 - http://www.state.nj.us/dep/online/
- 3. Complete NOx RACT Combustion Adjustment Report
 - www.nj.gov/dep/aqpp/downloads/NOx RACT How To.pdf









Waste Oil Heaters ALL used oil heaters are regulated by NJDEP Requirements: O Heater(s) under 500,000 BTU/hr Must Register with NJDEP Multiple heaters allowed if combined heat input <500,000 BTU/hr Penalty for not registering: \$200 (first offense) O Heater(s) ≥ 500,000 BTU/hr Requires a Pre-Construction Permit from NJDEP

Waste Oil Heaters

Installation Requirements

- May be used only for space heating or heating water
- Must use standard/certified equipment
- Must use oil generated on-site or from household do-it-yourselfers
- Stack height At least 20 ft above grade & above roof peak

Tune up & combustion adjustments

- · At startup & annually thereafter
- CO & oxygen measurements
- Recordkeeping





Waste Oil Heaters

Fuels Allowed

- crankcase oil
- transmission fluid
- power steering fluid
- brake fluid
- commercial fuel oil #1 & #2
- used oil from vehicles

Fuels Not Allowed

- antifreeze
- carburetor cleaner
- paint thinner
- paint
- part degreaser solvents
- gasoline
- oil additives
- chlorinated solvents
- battery acid
- other hazardous wastes



EGs: Operating Scenarios

NJDEP Allows Operating Emergency Generators:

- During the performance of normal testing and maintenance procedures
- When there is a power outage or the primary source of mechanical or thermal energy fails because of an emergency; or
- When there is a voltage reduction issued by PJM and posted on the PJM internet website (www.pjm.com) under the "emergency procedures" menu.
- <u>Peak Shaving and Curtailment are Prohibited by the</u>
 NJDEP EG General Permit



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EGs: Load Reduction

Use of engines to generate electrical power is permitted provided the equipment meets:

- NOx provisions of N.J.A.C. 7:27-19.8 & SOTA requirements of 7:27-8 and 7:27-22.
- These provisions usually require that a diesel engine be retrofit with selective catalytic reduction (SCR) and a particulate filter before being used as a non-emergency electrical generating engine

This includes peak shaving, power curtailment & Interruptible Load Response (ILR)



New EJIF Policies ASTs with Buried Piping & UHOTs



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New Policy for Buried Piping, Why?

Seaside Park (1997)

- Leak from the DPW UGP
- Conditional NFA issued by NJDEP 2011

Bayshore Regional Sewerage Authority (2004)

- · Diesel leak from Treatment Plant UGP
- Conditional NFA issued by NJDEP 2012

Haddonfield (2010)

- · Diesel leak from DPW UGP
- Compliant with SPCC corrosion protection
- Ongoing







Buried Piping – New Policy

Applicability:

- All ASTs which are equipped with buried product piping and which convey the following:
- Motor fuel, Petroleum products, hazardous substances, Used oil

Exemptions:

 Members who maintain continuous compliance with N.J.A.C 7:14B-4 and 7:14B-6 (UST Rules)

Requirements:

- Conduct a biennial industry standard integrity test of all underground piping (inner and outer piping);
- Maintain compliance with N.J.A.C7:14B-4 and 7:14B-6



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Buried Piping – New Policy

Deadline:

• Effective: March 17, 2012

• Compliance deadline: July 1, 2013

Reimbursement:

- Submit the testing results & copy of paid invoice to BSG.
- Upon review, the results will be forwarded to EJIF (PERMA) for reimbursement of up to \$400.00 per tank.



EJIF Policies - UHOTs

UnRegulated Heating Oil Tanks (UHOTs)

- EJIF currently provides coverage for USTs containing 2000 gallons or less of heating oil for on-site consumption that are not regulated by USEPA or NJDEP.
- The EPA expected lifespan of a single wall steel underground storage tank is approximately 15 years.
- The EJIF Executive Committee has approved the recommendation to discontinue coverage for unregulated tanks that exceed the 20 year age limit by January 1, 2014.



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EJIF Claims & Investigations

What is an environmental discharge?

- Any chemical, petroleum or industrial discharge into the soil, groundwater and/or surface waters of the State are regulated by the NJDEP under the New Jersey Spill Compensation and Control Act (N.J.S.A. 58:10-23.11 et. seq.)
- There is no de minimis volume for a Spill Act notification

What is a claim investigation?

- A claim investigation is triggered when an EJIF member experiences and reports a real or anticipated financial loss as a result of an environmental discharge and/or remediation efforts.
- A claim investigation is not required when there is no impact to the environment or when there
 will be no request to the FUND for reimbursement for the subsequent clean-up.
- Results of the claim investigation are reported to the Claims Administrator who makes coverage determinations.

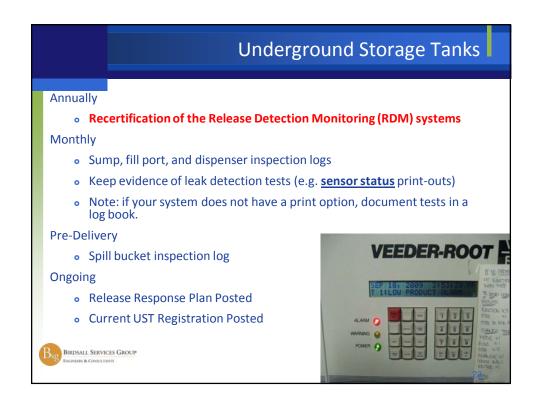
24/7 Claim Hotline

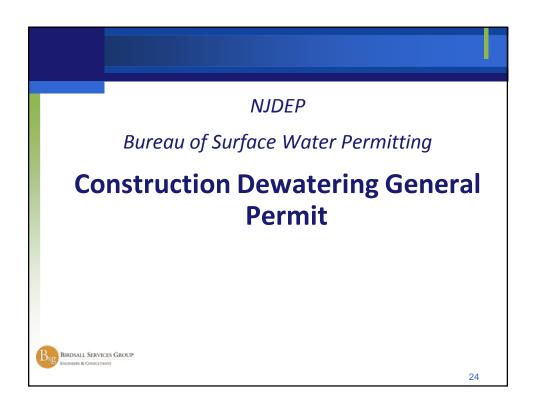
800-289-6681







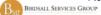




Construction Dewatering

Two elements of all construction dewatering activities:

- The "Diversion"
 - Where did it come from?
 - NJDEP Water Allocation Rule (N.J.A.C. 7:19-1)
- The "Discharge"
 - Where is it going?
 - New Jersey Pollutant Discharge Elimination System "NJPDES" Regulations (N.J.A.C. 7:14A)



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The "Diversion"

Diversions of groundwater or surface water of 100,000 gallons per day or more is regulated by the NJDEP

- Construction Dewatering projects may exceed this initially to lower the groundwater table
- In some cases, continuous exceedances of this volume may be required
- In either case, a permit is required for temporary or permanent diversions in excess of this volume



The "Diversion"

Dewatering Permit By Rule

- Must be from a coffer dam or a confined area to contain impacts from the diversion
- Must submit a letter at least 30 days prior to the diversion describing the location and method to be used
- Must repair/replace any well or surface water supply that becomes unusable due to the impact to capacity, quality or other reasons.



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The "Discharge"

Any Discharge of groundwater to surface water from construction dewatering activities is regulated by the NJDEP

- Options typically include:
 - Transport and Dispose off-site at an approved facility
 - Discharge to the local POTW with permission (C1 and CSO Areas)
 - Obtain a NJPDES permit and discharge to surface water



The "Discharge"

Construction Dewatering General Permit

- No application, but letter request must be submitted to NJDEP at least 14 days prior to the discharge
- Not eligible for:
 - Known Contaminated Sites or those suspected to contain groundwater contamination
 - Stormwater discharges
 - Filter backwash
 - Sediment laden waters
- The GP contains BMPs, temporary treatment units, and self monitoring without effluent limitations



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The "Discharge"

For sites that cannot meet the Construction Dewatering GP Requirements, options include:

- Petroleum Product Cleanup Permit (B4B)
- General Remediation Cleanup Permit (BGR)
 - Both permits have application requirements, initial groundwater characterization, sampling and effluent limitations.
 - Application requires public notice and NJDEP approvals
 - The BGR Permit also requires a TWA



Underground Storage Tanks

Release Response Plan

- Contingency plan in case of a release
- Must be posted/accessible
- Required for ALL regulated USTs
- A Licensed Site Remediation Professional (LSRP) or licensed firm must be "Identified" on the Plan but need not be "Retained"



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NJDEP

Bureau of Nonpoint Pollution Control

Industrial Stormwater Permitting Program



Stormwater Permit Applicability

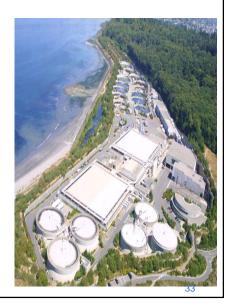
WASTEWATER TREATMENT FACILITIES

with...

 Design Flow of 1 Million Gallons per Day (MGD)

OR

 Approved pretreatment program under 40CFR Part 403 (i.e. Delegated Facilities)





Basic Industrial Stormwater General Permit

- Authorizes new and existing industrial stormwater discharges to surface waters and/or groundwaters of the State.
- Goal is to eliminate exposure of source materials



Non Applicability Form (NAF)

- Complete and submit to the NJDEP for approval if your facility meets one or more of the following:
 - > All stormwater is directed to a CSO
 - Stormwater discharge is authorized under existing NJPDES DSW or DGW Permit
 - Permanent No Exposure Source material and/or activities are performed within permanent structures

IF NOT....



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Permitting Process

- Request for Authorization (RFA) Was due by March 3, 2004 for existing facilities.
- Complete Stormwater Pollution Prevention Plan Due 6 mos. from EDPA.
- Implement SPPP within 18 mos. from EDPA
- Review and Recertify Annually



NJPDES

Industrial Stormwater Permit Does Not Cover...

- Floor drains
- Vehicle/equipment wash waters
- Compressor and boiler blow down
- Cooling tower bleed off
- Filter backwash water
- Hydrostatic testing water
- Water main disinfection water



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Industrial Stormwater Wrap-Up

If your MUA has a designed treatment capacity 1.0 MGD and greater...

And you have source operations or material present...

- · You are in!
- Source Material includes gasoline & diesel ASTs, fueling areas, generator fueling operations
- Septage transfer areas that drain to Plant still qualify for Industrial Permit!

Permanent No Exposure only applies if all operations & materials are inside a building!



Questions?

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