



State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DEPARTMENT of ENVIRONMENTAL PROTECTION

Division of Air Quality
MAILCODE: 401-02
401 E. State Street, 2nd floor, P.O. Box 420
Trenton, NJ 08625-0420

BOB MARTIN
Commissioner

February 27, 2015

To: Air Permitting Staff

From: Francis C. Steitz, Assistant Director

Subject: Allowable Emergency Generator Operations for Critical Facility Functions

This memorandum clarifies the allowable use of emergency generators to power critical functions of facilities when maintenance necessitates that the normal source of power for the critical function be disconnected. Examples of critical functions include, but are not limited to:

1. Facility's security checkpoint; without electrical power, the security checkpoint cannot screen employees, approve visitors, or respond to security incidents at the site.
2. Housing for research animals; without electrical power, the facility cannot properly care for the research animals.
3. Individual buildings at a site; without electrical power at the operations building, the station would be unable to provide essential safety communication or document operations, both of which are required by Federal regulations
4. A well water system is used, where the site does not have access to a municipal water system; without the proper water pressure, the fire suppression system, including sprinklers, cannot operate properly.
5. A refrigeration system used to store perishable materials or commodities; without electrical power, the material could spoil or be rendered unusable potentially causing off site odor impacts.
6. A compressed gas (e.g. air, nitrogen) system is used to operate pneumatic instrumentation or controls, or perform other operationally essential functions; without the compressed gas, the site would not be able to safely start-up, operate, or shutdown.

The Department has interpreted "normal testing and maintenance," of an emergency generator as defined in N.J.A.C. 7:27-19.1 to include planned system reliance testing when a facility has determined such testing is necessary to protect assets or health and safety, provided this use is included in internal written protocol or procedure, has sufficient hours of operation for testing

and maintenance provided for it in an air permit, and is not conducted on days when the Department forecasts air quality anywhere in New Jersey to be “unhealthy for sensitive groups,” “unhealthy,” “very unhealthy” or “hazardous”. Procedures for determining the air quality forecasts for New Jersey are available at the Department air quality web site at <http://www.state.nj.us/dep/aqpp/aqforecast>.

The Department is further interpreting Subsection 3i of the definition of “emergency generator” in N.J.A.C. 7:27-19.1 to include periods of maintenance for facility substations and onsite electrical distribution systems when power must be shut down to safely perform maintenance. When there is system maintenance work upstream of the emergency generator, which disconnects the critical sections from their normal source of power, the emergency generator may be used to power the critical sections of the plant during the maintenance event. Once the maintenance is complete and normal power is restored to the critical portions of the plant, the emergency generator must cease operation.

The limitations on hours of operation of the emergency generator for testing and maintenance include the hours used for system maintenance and must be included in the records of the testing and maintenance operation used to demonstrate compliance with the hours limit in the air permit. Actual emissions for all periods of testing and maintenance must be included in the facility’s emission statement.

All emergency generators must continue to comply with all other applicable Federal, State and Local requirements.

C: Richelle Wormley, Air and Hazardous Materials Compliance & Enforcement
 Bill O’Sullivan, DAQ