



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR ENFORCEMENT
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CHRIS CHRISTIE
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Lt. Governor

BOB MARTIN
Commissioner

MEMORANDUM

To: Public Water Systems; Wastewater and Stormwater Systems and Sludge Management Facilities

Through: Marcedius Jameson - Director, Water Enforcement
Matthew Maffei - WRM, Emergency Management Coordinator
Michele M. Putnam - Director, Division of Water Quality
Karen Fell - Assistant Director, Division of Water Supply & Geoscience

From: Richelle B. Wormley - Director, Division of Air Enforcement

Date: October 28, 2015

RE: **Approval for Testing and Maintenance of Emergency Generator within 48 hours of a National Weather Service designated named storm**

The continued flow of power to the primary components of wastewater and drinking water facilities is essential to maintaining effective operation of your system and meeting the established service standard and, therefore, protection of public health and the environment.

In order to meet the applicable standard(s), adequate auxiliary power must be provided to operate the system in the event of an interruption to the primary power source. The essential elements for providing sufficient auxiliary power are addressed in technical guidance entitled "Auxiliary Power Guidance and Best Practices" available at <http://www.nj.gov/dep/watersupply/pdf/guidance-ap.pdf>

In the past, as part of storm preparations, your system was required to obtain approval from NJDEP on a case-by-case basis to allow for normal testing and maintenance of your emergency generator(s) at any time regardless of the air quality, within 48 hours of a National Weather Service designated named storm impacting your area of the State.

The purpose of this memorandum is to address this issue and inform you that the NJDEP has streamlined this process. The NJDEP's Air Quality Program is providing approval for you to perform normal testing and maintenance on your emergency generator(s) at any time, regardless of air quality, within 48 hours of a National Weather Service designated named storm impacting your area of the State.

Pursuant to N.J.A.C. 7:27-19, this approval for emergency generator operation is limited to the following conditions:

- a. During the performance of normal testing and maintenance procedures, as recommended in writing by the manufacturer and/or as required in writing by a Federal or State law or regulation;
- b. When there is power outage or the primary source of mechanical or thermal energy fails because of an emergency; or
- c. When there is a voltage reduction issued by PJM and posted on the PJM internet website (www.pjm.com) under the "emergency procedures" menu.

Operation of the generator that does not meet at least one of the above three criteria disqualifies the generator from meeting the definition of an emergency generator.

For these limited circumstance, the NJDEP is exercising its discretion not to enforce the provisions of N.J.A.C. 7:27-19.2(d)2 which prohibits normal testing and maintenance on emergency generators when the air quality is unhealthy.

All other requirements of your emergency generator(s) air permit and the requirements of N.J.A.C. 7:27-19 for emergency generators must be satisfied including the limitations on operation to be considered as an emergency generator.

In addition NJDEP expects that testing of any single emergency generator will not exceed 30 minutes, unless there is a malfunction, in which case, further limited testing is required after appropriate maintenance is performed. If a malfunction is detected, the malfunction and maintenance performed to fix the malfunction must be recorded in the emergency generator operations log.

Lastly, the owner or operator of an emergency generator shall maintain records in a logbook or computer data system in accordance with the recordkeeping requirement specified in its emergency generator's current air permit, or, at a minimum, in accordance with N.J.A.C. 7:27-19.11, as follows:

1. Once per month, the total operating time from the generator's hour meter;
2. For each time the emergency generator is specifically operated for testing or maintenance:
 - i. The reason for its operation;
 - ii. The date(s) of operation and the start-up and shut-down time;
 - iii. The total operating time for testing or maintenance based on the generator's hour meter; and
 - iv. The name of the operator; and
3. If a voltage reduction is the reason for the use of the emergency generator, a copy of the voltage reduction notification from PJM or other documentation of the voltage reduction.
4. The owner or operator of an emergency generator shall maintain the records required above for a period of no less than five years after the record was made and shall make the records readily available to the Department or the EPA upon request.
5. When the air quality forecast at <http://www.njaqinow.net/> is unhealthy or worse, notify DEP by calling the hotline at 1 -877-WARN-DEP (1-877-927-6337) each time you conduct normal testing and maintenance of emergency generators within 48 hours of a National

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Weather Service designated named storm impacting your area of the State.

REMINDER - The operation of emergency generator is not allowed for demand response or peak shaving programs. To participate in demand response or peak shaving programs, a facility must obtain a regular air Preconstruction or Operating permit approval.

If you any questions regarding this matter, please contact me or Larry Si at 609-633-7288.

Cc: Frank Steitz – Director, Division of Air Quality Regulations & Planning
Ken Ratzman – Assistant Director, Division of Air Quality Regulations & Planning
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