

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
CLIMATE AND ENVIRONMENTAL MANAGEMENT
DIVISION OF AIR QUALITY

P.O. Box 420 Mailcode 401-02 Trenton, nj 08625-0420 BOB MARTIN Commissioner

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Governor

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TO:

Joel Leon

Section Chief, Air Quality Evaluation Section (AQES)

FROM:

John Preczewski, Assistant Director

Air Quality Permitting Program

SUBJECT:

Exempting Emergency Generator and Fire Pump Nitrogen Oxide (NO₂) and

Sulfur Dioxide (SO₂) Emissions from 1-hour NO₂ and SO₂ Air Quality

Modeling

DATE:

July 29, 2011

This memorandum is meant to clarify modeling of NO₂ and SO₂ emissions from emergency generators and fire pumps which operate at combined cycle turbine facilities. This guidance applies primarily to large power generating sources; though, it can be applied on a case-by-case basis to other facilities.

Under the following permit conditions, modeling to show compliance with the 1-Hour NO₂ and SO₂ NAAQS will not include emissions from emergency generators or fire pumps located on-site:

- 1. The annual cumulative operation of the emergency generator or the fire pump during testing will not exceed more than 100 hours per year. The duration of these test operations will be restricted to 30 minutes.
- 2. There will be no simultaneous testing of emergency generators and/or fire pumps.
- 3. Testing of any emergency generator and/or the fire pump will not occur during startup or shutdown of the turbine or boiler.
- 4. No testing will occur on designated "Ozone Action Days" as required by N.J.A.C. 7:27-19.2(d)2.
- 5. The emergency generator or fire pump may fire only ultralow sulfur diesel fuel (sulfur content less than 15 parts per million by weight) or natural gas.

Please contact me if there are any questions.