



State of New Jersey

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DIVISION OF AIR QUALITY & RADIATION PROTECTION

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MEMORANDUM

TO: Bureau of Stationary Sources Staff

FROM: Danny Wong, Chief
Bureau of Stationary Sources

DATE: June 24, 2025
(This is an update to March 20, 2024 and August 13, 2024 memorandums)

SUBJECT: Hazardous Air Pollutant (HAP) Emissions from Emergency Generators

This memorandum addresses the inclusion of HAP emissions and diesel particulate matter (DPM) from Emergency Generators in the Potential to Emit (PTE) section of Air Pollution Control (APC) permit applications and health risk assessments. Emergency Generators that comply with the criteria below are subject to this memorandum:

1. Is a significant piece of equipment pursuant to N.J.A.C. 7:27-8 and/or 22; and
2. Meet the definition of "Emergency Generator" in N.J.A.C. 7:27-19.1.

(Unofficial copies of the Air Rules - <https://dep.nj.gov/aqm/rules/rules27/>)

HAP and DPM Emissions in PTE Section

The maximum potential HAP and DPM emissions should be calculated based on the allowable number of hours permitted for testing and maintenance.

HAP emissions emitted during Emergency Generator testing and maintenance must be listed in APC permit applications if the potential emissions exceed any of the reporting thresholds in N.J.A.C. 7:27-17.9(a), pursuant to N.J.A.C. 7:27-8.4(k)1 for Preconstruction Permits and pursuant to N.J.A.C. 7:27-22.3(c) for Operating Permits.

For Emergency Generators, the Department determined that DPM emissions are equivalent to PM₁₀ emissions. Therefore, DPM emissions must be listed in APC permit applications if the

PM₁₀ emissions are equal to or greater than 0.05 pounds per hour (lb/hr) since 0.05 lb/hr is the PM₁₀ reporting threshold in both N.J.A.C. 7:27-8 and -22.

HAP and DPM Inclusion in Health Risk Assessments

HAP and DPM emissions listed in the PTE section of APC permits should be included in a health risk assessment, including risk screening, refined risk, and facility wide risk as applicable, if any one of the following is met below:

1. A facility that is subject to the EJ Rule (N.J.A.C. 7:1C); or,
2. A facility where the total maximum rated heat input for all emergency generators at the facility is equal to or greater than:
 - a. 100 MMBtu/hr when all of the emergency generators combust distillate fuels only;
 - b. 70 MMBtu/hr when all of the emergency generators combust gaseous fuels; or
 - c. 70 MMBtu/hr when the facility has emergency generators where some units combust only gaseous fuels and other units that combust only distillate fuels.

The PTE for facility wide risk assessment should include emissions from the General Permit (GP/GOP) for emergency generators for testing and maintenance. Although risk assessment is not required when obtaining a General Permit (already addressed as part of the development and approval of the General Permit), the emissions from the General Permit should be part of the facility wide PTE for the risk assessment as part of a PCP or BOP permit review.

The Department encourages the use of the Risk Screening Worksheet for Long-Term Carcinogenic and Noncarcinogenic Effects and the Cancer Risk Screening Worksheet for Nonroad Diesel Engines to first determine if refined modeling is necessary for the emergency generators as part of the facility-wide risk assessment (<https://dep.nj.gov/boss/risk-screening-tools/>). When evaluating risk for DPM, both the diesel engine emissions (long-term non-cancer risk) and the diesel exhaust particulates (cancer risk) from the [Toxicity Values for Inhalation Exposure](#) are used. For further information on risk assessment, refer to Technical Manual 1003 (<https://dep.nj.gov/boss/technical-manuals/>). If you have any questions on Technical Manuals 1002 and 1003 and/or the risk screening worksheets, please contact the Bureau of Evaluation & Planning at 609-292-6722.

This memorandum supersedes all previous guidance (dated prior to June 24, 2025) for determining whether risk assessment for emergency generators is necessary.