



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: March 20, 2024; Updated August 13, 2024

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

This memorandum addresses 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. Meet the definition of “Emergency Generator” in N.J.A.C. 7:27-19.1; and
2. Operate consistent with the provisions of N.J.A.C. 7:27-19.2(d).

HAP Emissions in PTE Section

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

HAP Inclusion in Health Risk Assessments

HAP emissions exceeding the reporting thresholds at N.J.A.C. 7:27-17.9(a), including DPM, emitted during Emergency Generator testing and maintenance, as 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);
2. A major facility (as defined at N.J.A.C. 7:27-22.1) where emergency generators are a significant part of the facility total PTE; or
3. A non-major facility that will become major facility with the approval of a pending preconstruction permit and where emergency generators are a significant part of the facility total PTE.

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/>). For further information on risk assessment, refer to Technical Manual 1003 (<https://dep.nj.gov/boss/technical-manuals/>).

This memorandum supersedes previous guidance on risk assessment for emergency generators.