



State of New Jersey

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DIVISION OF AIR QUALITY & RADIATION PROTECTION
BUREAU OF STATIONARY SOURCES

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MEMORANDUM

TO: Jeff Meyer, Chris Odgers, Jim Scarvalli, and Larry Si
Bureau Chiefs, Division of Air Enforcement

FROM: Danny Wong, *DW*
Bureau Chief, Stationary Sources

SUBJECT: Definition of Startup

DATE: February 13, 2024

The purpose of this memorandum is to define the word “startup” in the context of stack testing requirements in air permits.

Background

Currently, there is no definition for “startup” in New Jersey’s air rules. This has caused many questions when interpreting this term in air permits, especially when determining initial startup or “first fire”. Therefore, this memo will provide guidance and clarity on this issue.

Definition of Startup

As in most cases, if the Department does not have a definition for a term in New Jersey’s air rules, the Department would refer to Federal regulations if available. In this case, there are Federal regulations that define “startup” – 40CFR60 §60.2 Definitions and 40CFR63 §63.2 Definitions. The definition the Department is establishing in this memo below is to clarify what is already defined in the Federal regulations.

Unless otherwise specifically defined by rule or regulation, startup means the setting in operation of an affected source or portion of an affected source for any purpose. For combustion sources this is generally deemed to be the first firing of fuel to produce heat, steam, electrical energy or mechanical energy. For process equipment this is generally deemed to be the first introduction of

feed or raw materials that results in an output, whether useable or not. Startup does not include “pre-startup” operations.

For general and specific guidance on what may constitute pre-startup operations, refer to EPA’s “Instructional Manual for Clarification of Startup in Source Categories Affected by New Source Performance Standards” (<https://www.epa.gov/sites/production/files/2015-08/documents/nspsaffsource.pdf>).

The facility is responsible for justifying any operation that is to be deemed as pre-startup, though acceptance is at the sole discretion of the Department. It should be noted though that the inability to reach or maintain the maximum production or operation rate does not delay the startup date.

c: Kenneth Ratzman, Assistant Director
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