Clean Air Compliance

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Dept. Environment and Natural Resources

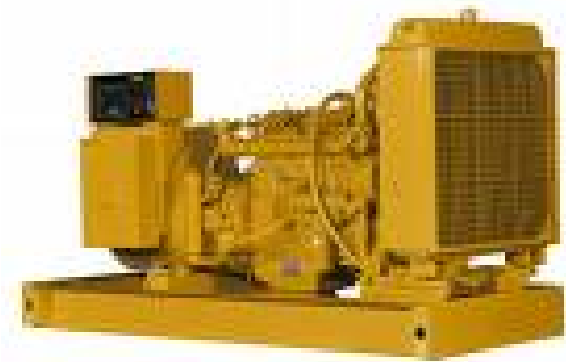Division of Air Quality

Air Permits Section

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Outline

- Definitions:
  - Emergency generator
  - Peak shaver
- Discuss memos
  - US EPA
  - DAQ – Permitting
- NSPS
- Summary/Conclusions
- Future Concerns
- Contact Information
- Questions

Emergency generator

- Reciprocating internal combustion engine used to supply backup power when local utility is unavailable

- By EPA definition, these units operate less than 500 hours per year

- Projected future actual emissions of a regulated pollutant is each less than 5 tons using 500 hours of operation per year.

Peak shaver

- Reciprocating internal combustion engine used to supply power to lessen demand during peak load at a facility

- Projected future actual emissions of regulated pollutants is each less than 5 tons per year

Memo #1

- US EPA memo dated 1995

  - Describes the "permitting" definition of an emergency generator

  - Definition will be used to exempt generators from requiring a permit

Memos #2 and #3

■ Division of Air Quality memos

- Exempts facilities from having to obtain a permit for emergency generators or peak shavers if:

  * Unit is the only source required to be permitted at the facility

- However, the generator or peak shaver is still required to comply with any applicable rules

NSPS

- New Source Performance Standards
  40 CFR Part 60
  - Subpart IIII (Compression ignition)
    (Final rule in Federal Register 7/11/06)

  - Subpart JJJJ (Spark ignition)
    (proposed in Federal Register 6/12/07)

NSPS- Compression Ignition Engines

- Subject to requirements if:

  - engine is manufactured after 4/1/2006 or

  - engine is modified or reconstructed after 7/11/2005

- If less than 30 liters per cylinder must purchase certified units from the manufacturer. (Most units in the US are less than 30 liters per cylinder)

- Monitoring and recordkeeping requirements

- Fuel restrictions (sulfur content, ppm)

Summary/Conclusion:

- If the emergency generator or peak shaver is the only source at the hospital that would need a permit, no permit will be required by the DAQ.

- However, the generator or peak shaver must still comply with the NSPS requirements

- A reciprocating internal combustion engine operator who is subject to Clean Air Act requirements does not need to have a permit for the Division of Air Quality to enforce such requirements.

Future Concerns: Area Source MACTS

- Ethylene Oxide Sterilizers

  (40 CFR Part 63, Subpart WWWWW)

  Proposed Rule (November 6, 2006)

  You are exempt from the obligation to obtain a permit under 40 CFR Part 70 or 40 CFR Part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a).   Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

  The Director will decide if any other permit is needed.

Future Concerns: Area Source MACTS

- Reciprocating Internal Combustion Engines that are less than or equal to 500 brake horse power

  (40 CFR Part 63, Subpart ZZZZ - proposal to Final Rule)

  You are exempt from the obligation to obtain a permit under 40 CFR Part 70 or 40 CFR Part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

The Director will decide if any other permit is needed.

Information:

- Contact For Area MACTS – Donnie Redmond

  Donnie.Redmond@ncmail.net

40 CFR Part 60, Subpart JJJJ – Proposed Rule

Federal Register (6/12/2006)

40 CFR Part 63, Subpart WWWWW

Ethylene Oxide Sterilizers – Proposed Rule

Federal Register (4/7/2006 and 11/6/2006)

40 CFR Part 63, Subpart ZZZZ – R.I.C.E

Proposed for units smaller than 500 brake horsepower

Federal Register (6/12/2006)

Helpful Websites:

http://www.epa.gov/fedrgstr/EPA-AIR/

(need to know the date of publication)

http://www.epa.gov/ttn/atw/mactfnlalph.html

(Table of MACT Standards)

Questions