



North Carolina Department of Environment and Natural Resources  
Division of Air Quality

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Winston-Salem  
William G. Ross, Jr., Secretary  
B. Keith Overcash, P.E., Director

Michael F. Easley, Governor

January 24, 2007

Memorandum

To: Regional Supervisors  
Section Chiefs

From: Keith Overcash, P.E. *Keo*

Subject: Emergency Generators Exemption

This memorandum supercedes the memorandum of October 16, 2006 concerning the exemption of certain emergency generators from permitting requirements. This revision allows exempt emergency generators to be used as "peak shavers" as long as facility-wide actual emissions (of each criteria pollutant) remain under the 5-tons/yr-exemption level and also allows generators subject to the newly promulgated NSPS Subpart III "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" to be exempt from permitting requirements under the facility-wide 5-tons/yr-exemption.

The number of communications towers having emergency generators has increased in recent years and is causing a burden on the permitting and inspections process without yielding significant benefit to the environment.

Currently, emergency generators that do not meet the exemption found at 2Q.0102(c)(2)(B)(iv) (as clarified by Appendix 27-7 to base potential hours of operation on 500 hr/yr) are required to have a permit. The permit requires the facility to submit actual data (emissions inventory with the permit renewal request). In nearly all cases, the actual data is showing that actual emissions are less than 1 ton/yr for each regulated pollutant. We are then exempting the facility pursuant to 2Q .0102(c)(2)(E)(ii) for actual emissions less than 5 ton/yr and rescinding the permit.

Therefore, due to the infrequent nature of the operation of these generators and the relatively insignificant amount of air emissions expected, it will be DAQ's policy to allow these facilities to be evaluated for permit exemption based on expected/projected actual emissions data submitted with the permit application. This would enable us to exempt nearly all facilities from the beginning and would greatly reduce the regulatory burden. This policy only applies to facilities such as communications towers where the emergency generator(s) is the only source of emissions and where the generator(s) does not have the potential (at 500 hrs/yr) to emit any regulated pollutant greater than Title V permitting thresholds.

An emergency generator may be used as a peak shaving generator provided the facility-wide actual emissions of each criteria pollutant remain under the respective 5-tons/yr-exemption level.

The generator(s) shall comply with rules 2D .0516 (sulfur dioxide emissions from combustion sources), 2D .0521 (control of visible emissions), and .0524 (new source performance standard) even if an air permit is not required.

cc: Thom Allen  
Edythe McKinney