

**Emergency Engine
And
Emergency Turbine
Environmental
Certification Workbook**

**For use with the MassDEP
Environmental Results Program**

Massachusetts Department of Environmental Protection

THE ENVIRONMENTAL RESULTS PROGRAM

INTRODUCTION

The Massachusetts Environmental Results Program (ERP) is an on-going environmental performance enhancement and measurement initiative that seeks to cost-effectively improve the environmental performance of whole small business sectors. In this regulatory system, comprised of a unique set of linked regulatory tools, institutions and businesses are educated about their environmental impact and obligations, are required to self-evaluate and certify compliance, and are tracked to measure environmental performance changes. The Massachusetts Department of Environmental Protection (MassDEP) uses a statistical approach to track individual facility and whole-group performance results to identify poor performance areas and to effectively target limited agency compliance assistance and enforcement resources.

The ERP now includes performance standards that include the use of clean fuels, equipment maintenance, and record keeping requirements for new emergency engines with a rated power output equal to or greater than 37 kilowatts (kW) and emergency combustion turbines with a rated power output less than one megawatt (MW). You must submit an initial installation certification that your facility meets environmental performance standards. By simplifying and clarifying the regulatory process, MassDEP hopes to reduce the cost and time required for compliance, while maintaining effective standards and improving environmental results. This workbook provides the information you must understand to meet your environmental obligations.

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GETTING STARTED

1.1 WHO IS SUBJECT TO ERP FOR EMERGENCY ENGINE AND EMERGENCY TURBINES?

An owner or operator who installs, after March 23, 2006, an emergency engine with a rated power output equal to or greater than 37 kW or an emergency combustion turbine with a rated power output less than one MW is subject to the requirements of the Environmental Results Program (ERP) for emergency engines and emergency turbines.

1.2 WHO SHOULD READ THIS WORKBOOK?

Engine or Turbine Supplier/Installer:

All emergency engines with a rated power output equal to or greater than 37 kW and emergency combustion turbines with a rated power output less than one MW installed after March 23, 2006 must meet the air emission limits specified in the Engine and Combustion Turbine ERP regulation [310 CMR 7.26(42)] and outlined in this workbook. Therefore, it is crucial that you understand the requirements to ensure that the emergency engine or emergency turbine you install is capable of meeting the standards. You are also a primary source of technical expertise to your customers. Providing the information and service that your customer needs to operate and maintain the engine or turbine as efficiently and cleanly as possible not only minimizes emissions but is a good business practice as well. You are also responsible for supplying information to the owner/operator that each engine or turbine you supply/install complies with the applicable emission performance standards.

Facility Owner/Administrator:

As the owner or chief administrator of the facility, it is important that you understand the regulatory requirements described in this workbook. It is your responsibility to ensure that your new engine or turbine is operated in compliance with the applicable environmental regulations. By ensuring that the “hands-on” person who operates the engine or turbine understands the material in this workbook, you can make sure that the new engine or turbine is run cleanly and efficiently, with minimal impact to the environment and only during those periods when emergency units are allowed to be operated. You will also be confident that the compliance certification you must sign is completed accurately and truthfully.

Under the heading "Related Activities", this workbook provides information you may need if underground petroleum storage tanks are located on your property.

Engine or Turbine Operator:

As the operator, it is equally important that you understand the material in this workbook. You are the “hands-on” person who has the daily responsibility to operate and maintain the unit properly. To ensure compliance you must understand the fuel, stack, operational and record keeping requirements including when it is permissible to operate the unit. You should also read the Related Activities section if you manage underground petroleum storage tanks.

1.3 WHAT YOU SHOULD KNOW AS A FACILITY OWNER / ADMINISTRATOR

- The cornerstone of the Emergency Engine ERP is the requirement that these engines comply with the applicable EPA Non-Road engine emission standards at the time of installation. For example, a 500kW engine installed in 2006 must meet EPA’s non-road emission limitations for a model year 2006 500kW engine.
- Emergency turbines must comply with an emission limitation for oxides of nitrogen (NOx) set at 0.60 pounds per MW- hour.
- Particular care is required when locating emergency engines and emergency turbines so as not to cause a localized health or nuisance problem from emissions or sound impacts. The clean fuels requirement is a key component in assuring exhaust impacts are minimized from these units.
- Emergency engines and turbines are allowed to operate no more than 300 hours during any rolling 12-month period. This includes periods of normal operation and maintenance as recommended by the manufacturer. Each unit must be equipped with a non-turnback hour counter that is operated and maintained in good working order.
- Emergency is defined as “an electric power outage due to failure of the grid, in whole or in part, on-site disaster, local equipment failure, flood, fire, or natural disaster. Emergency shall also mean when the imminent threat of a power outage is likely due to failure of the electrical supply or when capacity deficiencies result in a deviation of voltage from the electrical supplier to the premises of three percent (3%) above or five percent (5%) below standard voltage, or periods during which the regional transmission organization directs the implementation of voltage reductions, voluntary load curtailments by customers, or automatic or manual load shedding within Massachusetts in response to unusually low frequency, equipment overload, capacity or energy deficiency, unacceptable voltage levels, or other such emergency conditions.”

- The air contaminants emitted by engines and turbines can have significant health impacts, especially to the very young, the elderly, and the people suffering from respiratory illnesses. Particulate matter, especially the small-sized particulate matter generated by fuel combustion, can cause and contribute to serious respiratory problems. Sulfur dioxide (SO₂) and NO_x are respiratory irritants and key ingredients in the formation of acid rain. NO_x is also a major contributor to summertime smog.
- There is no need to obtain a pre-construction plan approval under 310 CMR 7.02. Under ERP you submit a *certification* within 60 days following the start of engine or turbine operation. This allows you to quickly replace an old failing engine or turbine with a new unit that meets currently applicable standards for new units at the time of installation.
- If you identify compliance problems that cannot be corrected before submittal deadline, you must file a Return to Compliance Plan (RTC) for each of the problems along with your Compliance Certification. The RTC requires you to explain the problem, list the correction actions to be taken, and provide an anticipated return to compliance date. MassDEP may follow up with additional questions or an on-site inspection, if necessary.
- There is no fee associated with the certification. Please note that your facility still may be subject to other MassDEP fees, such as the annual air quality or hazardous waste compliance assurance fees.
- Installation of a new emergency engine and emergency turbine can have facility-wide ramifications. Potential emissions of the new emergency engine and emergency turbine may cause total emissions from your facility to exceed thresholds for other air pollution control requirements, including New Source Review (NSR), Operating Permits, and Prevention of Significant Deterioration (PSD).

If are or become a major source of air emissions you could be subject to one or more of the following:

- Operating Permit Program
- Emission Offsets and Non-attainment Review
- Prevention of Significant Deterioration requirements

If you have any questions concerning whether or not your facility is subject to any of these programs, please call your MassDEP Regional Service Center for additional information. See <http://mass.gov/dep/about/region/findyour.htm>.

- You should also be aware that compliance with the requirements of emergency engine and emergency turbine ERP does not relieve you of the responsibility to comply with other regulations such as, federal 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, which requires notification, record keeping, and reporting to the U.S. EPA. These rules were proposed on July 11, 2005. The EPA Customer Service Center may be called at (617) 918-1111 for further information.
- NOTIFICATION TO MassDEP IS REQUIRED within 60 days following the start of operation. Certification Forms are available at:
<http://www.mass.gov/dep/service/online/erpforms.htm>

The following sections describe the specific air quality and industrial wastewater requirements for emergency engines and emergency turbines.

AIR QUALITY REQUIREMENTS

2.1 EMISSION LIMITS

The owner or operator must keep documentation that the emergency engine or emergency turbine as designed and installed will comply with the applicable emission limits for the first three years of operation when operated according to the manufacturer's instructions. The documentation shall be in the form of a written statement provided by the equipment supplier as follows:

- For emergency engines burning fuel oil: a statement that a certificate of conformity has been obtained pursuant to EPA's non-road engine requirements.
- For emergency engines burning natural gas: a letter or other documentation from the supplier stating that the engine meets the applicable non-road emission limitations.
- For emergency turbines using any fuel: a statement that the unit meets the emission limitation for NO_x.

Visible emissions may not exceed 20% opacity at any time during emergency engine and emergency turbine operation. Visible emissions do not include water vapor.

2.2 FUEL REQUIREMENTS

To ensure efficient combustion and compliance with the emissions limitations, emergency engines and emergency turbines must be operated and maintained according to the manufacturer's instructions. On and after July 1, 2007, you shall not accept delivery for burning in your unit, fuel oil that does not conform to EPA's sulfur limits for transportation distillate fuel (15 parts per million (ppm) sulfur).

2.3 OPERATIONAL REQUIREMENTS

- An emergency engine or emergency turbine may not operate more than 300 hours per 12 month rolling period during times of emergency and for normal maintenance and testing as recommended by the manufacturer.
- Emergency means an electric power outage due to failure of the grid, in whole or in part, on-site disaster, local equipment failure, flood, fire, or natural disaster. Emergency shall also mean when the imminent threat of a power outage is likely due to failure of the electrical supply or when capacity deficiencies result in a deviation of voltage from the electrical supplier to the premises of 3 % above or 5 % below standard voltage, or periods during which the regional transmission organization directs the implementation of voltage reductions, voluntary load curtailments by customers, or automatic or manual load shedding within Massachusetts in response to unusually low frequency, equipment overload, capacity or energy deficiency, unacceptable voltage levels, or other such emergency conditions.
- The unit shall be equipped with a non-turnback hour counter to track hours of operation.
- Units shall be operated and maintained in accordance with the manufacturer's recommended operating and maintenance procedures.

2.4 STACK DESIGN REQUIREMENTS

The stack must discharge vertically upward. Stack heads, devices used to prevent precipitation from entering the stack, must not restrict the vertical flow of the exhaust gas stream. Devices such as “shanty caps” and “egg beaters” are prohibited. Coning of the top of the stack is acceptable. No more than a one-inch change in diameter to every five inches in length of cone is recommended in order to avoid serious backpressure that may affect air flow at the point of origin.

Stacks must be designed to minimize plume entrapment in wakes caused by obstructions to air streams.

- Care must be taken to locate units to avoid exhaust impacts upon people, windows and doors that open, fresh air intake, and other sensitive receptors.
- Units rated at 300kw but less than one megawatt shall have a minimum stack height of ten feet above the facility roof-top or unit enclosure, whichever is lower. Again care must be taken to locate the unit to avoid exhaust impacts.
- For units rated at one megawatt and above, the minimum stack height must be 1.5 times the height of the building on which the stack is located. If the stack is less than 1.5 times the height of your building, or if any *adjacent structures* are taller than your stack (see *adjacent structure* in Section 5: Definitions), air quality modeling must be performed to document that the National Ambient Air Quality Standards (NAAQS) will not be exceeded. Appendix 1 lists the minimum data inputs that would be needed to execute an EPA Screen3 Model run. If you need assistance, call the BWP Air Planning & Evaluation Branch at 617-292-5766.

2.4 SOUND

Another potential result of improper attention to locating your unit is the creation of a noise nuisance. Units should be housed in enclosures specifically designed to attenuate sound. Similar to exhaust impacts, locations that will impact people, such as locations near windows and doors that open, and other sensitive receptors are to be avoided.

2.6 RECORD KEEPING REQUIREMENTS

The following records must be kept onsite (or for remote locations, at the closest facility where records can be maintained) for the life of the ERP emergency engine and/or emergency turbine.

- Information on the equipment type, make and model and rated power output.
- If applicable, the results of an air quality model run which demonstrates that emergency engine and/or emergency turbine emissions have not caused an exceedence of the National Ambient Air Quality Standards (NAAQS).
- Copies of certificates and documents from the manufacturer and supplier related to the certificates.

You must also keep the following records for at least three years. This means that each individual record must be retained onsite (or at the closest facility where records can be maintained) for three years from the date it was “created”.

- A monthly log of hours of operation, fuel type, and for fuel oil, heating value and sulfur content.
- A monthly calculation of the total hours operated in the previous 12 months.
- Purchase orders, invoices, and other documents to substantiate information in the monthly log.

RELATED ACTIVITIES

3.0 Underground petroleum storage tanks:

Single wall, bare steel underground storage tanks containing petroleum products, including those resting on the ground, were required to meet leak detection and corrosion protection standards, or be replaced, as of December 22, 1998. For more information, contact your local fire Department.

DEFINITIONS AND TERMS

Adjacent structure: means a structure that is within 5L of the stack. 5L means five times the lesser dimension (height or maximum horizontal width) of the structure.

Air contaminant: volatile organic compounds (VOC's), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and particulate matter are contaminants of concern in achieving air quality standards in the United States. Each geographic area is required to meet specific limits for each contaminant.

Distillate Fuel Oil: fuel oil that complies with the specifications for fuel oil, numbers 1 or 2, as defined by the American Society for Testing and Materials.

Emergency: an electric power outage due to failure of the grid, in whole or in part, on-site disaster, local equipment failure, flood, fire, or natural disaster. Emergency shall also mean when the imminent threat of a power outage is likely due to failure of the electrical supply or when capacity deficiencies result in a deviation of voltage from the electrical supplier to the premises of three percent (3%) above or five percent (5%) below standard voltage, or periods during which the regional transmission organization directs the implementation of voltage reductions, voluntary load curtailments by customers, or automatic or manual load shedding within Massachusetts in response to unusually low frequency, equipment overload, capacity or energy deficiency, unacceptable voltage levels, or other such emergency conditions.

Emission: any discharge or release of an air contaminant to the ambient air.

Engines: spark ignition and compression ignition stationary reciprocating internal combustion engines.

NAAQS (National Ambient Air Quality Standards): Massachusetts is subject to national standards that deal with six criteria pollutants: particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO₂), ozone, carbon monoxide (CO) and lead.

Natural Gas: a naturally occurring mixture of hydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or liquid petroleum gas (LPG), as defined by the American Society for Testing and Materials. LPG includes propane, butane, or a combination of propane and butane.

Rated Power Output: the maximum electrical or equivalent mechanical power output stated on the nameplate affixed to the engine or turbine by the manufacturer.

Source Registration/Emission Statement: Any person who operates a new emergency engine and emergency turbine subject to this ERP program is required to submit a Source Registration and Emission Statement, including BWP AQ AP-1 form to MASSDEP.

Supplier: a person that manufactures, assembles, or otherwise supplies engines or turbines.

Turbine: a stationary combustion turbine.

Appendix 1

Minimum Data Inputs Required for an EPA Screen3 Model Run

(For use in determining emission impacts upon ambient air quality – Section 2.4.)

1. Stack height (feet) =>
2. Stack inside diameter (feet) =>
3. Stack gas exit temperature (^oF) =>
4. Stack flow rate (cubic feet per minute) =>
5. Building height (feet) =>
6. Minimum horizontal building width (feet) =>
7. * Maximum horizontal building width (feet) =>
8. Type of fuel (natural gas or red dye distillate fuel oil) =>
9. Millions of Btu per hour of fuel input =>
10. Emission rate (grams per second) =>

* Length of the diagonal line that bisects a building when viewing it from above.