



## State of New Jersey

DEPARTMENT of ENVIRONMENTAL PROTECTION

CHRIS CHRISTIE  
*Governor*

BOB MARTIN  
*Acting Commissioner*

KIM GUARDAGNO  
*Lt. Governor*

Environmental Regulation  
Division of Air Quality  
Air Quality Permitting Element  
401 E. State Street, 2<sup>nd</sup> floor, P.O. Box 027  
Trenton, NJ 08625-0027

March 18, 2010

Mr. Benedict DiFranco, CHFM  
President  
Healthcare Facilities Management Society of New Jersey, Inc.  
Post Office Box 95  
Cranford, NJ 07016

Dear Mr. DiFranco,

Thank you for your inquiry regarding operation of emergency generators at Health Care Management Society of New Jersey facilities. Specifically the question is; If requested by the electric utility when the utility has an "emergency" condition, may the hospital's generators be operated under the unlimited hours provision in their generator air permits?

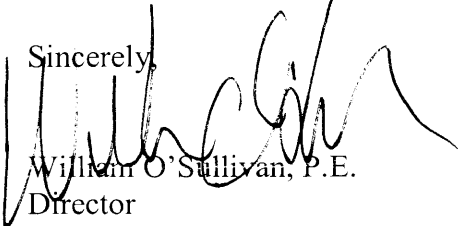
Emergency generators may be operated in three limited cases: during the performance of normal testing and maintenance procedures, as recommended in writing by the manufacturer and/or as required in writing by a Federal or State law or regulation; when there is power outage or the primary source of mechanical or thermal energy fails because of an emergency; or when there is a voltage reduction issued by PJM and posted on the PJM internet website ([www.pjm.com](http://www.pjm.com)) under the "emergency procedures" menu. Operation of the equipment that does not meet one of these three cases disqualifies the equipment in question from meeting the definition of an emergency generator.

Operation of an emergency generator is limited to times of actual voltage reduction by the utility and is to prevent damage to electrically operated equipment at the host facility. Operation of an emergency generator in advance of an actual voltage reduction to support the grid at the request of the utility is not allowed as it is outside of the scope of emergency operation as defined above (N.J.A.C 7:27-19.1 Definitions: "Emergency Generator"). PJM or the utility may have a broader characterization of a grid emergency than allowed for an emergency generator without air pollution controls.

These limitations on allowable operation for emergency generators are not a general prohibition of generating electricity by your member hospitals. When N.J.A.C. 7:27-19 was revised in 2005 the department required non-emergency engines to meet new cleaner air standards. Use of engines to generate electrical power is permitted provided the

equipment meets the NOx provisions of N.J.A.C. 7:27-19.8 and the state of the art requirements of 7:27-8 and 7:27-22. These provisions usually require that a diesel engine be retrofit with selective catalytic reduction (SCR) and a particulate filter before being used as other than an emergency generator.

If you have questions or need any additional information or would like to discuss this further, please contact Frank Steitz, Chief, Air Quality Bureau of Permits at (609) 633 – 8220.

Sincerely,  
  
William O'Sullivan, P.E.  
Director  
Division of Air Quality

c: W. Terry Boston, President & CEO, PJM  
Edward Choromanski, Administrator, Air Enforcement  
John Preczewski, Assistant Director, Division of Air Quality  
Frank Steitz, Chief, Bureau of Permits, Division of Air Quality

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