

# LEHDER Environmental Services

March 2009

## Source Emission Limits for Non-Emergency Power Generation

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### Introduction

In late February 2009 the Ministry of the Environment (MOE) announced new or reduced limits for on-site internal combustion engines which are used for non-emergency power generation.

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### Background

These new limits are to ensure that the emissions from generators used for non-emergency electricity generation are similar to those from natural gas combustion turbines. These limits will apply to all generators used for non-emergency electricity generation when using fuels such as diesel, bio-diesel, natural gas or bi-fuel. Start-up and shut-down conditions are not included; meaning that these limits apply only to steady state operations. All generators used in this fashion are required to use Ultra Low Sulphur Diesel or equivalent maximum allowable equivalent sulphur emissions levels are required if other fuels are used.

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### Contaminants Specified

The MOE is considering more stringent limits on emissions from on-site generator used for non-emergency use. These limits will be phased in and affect the following contaminants:

- NO<sub>x</sub> (expressed as NO<sub>2</sub> equivalent)
  - PM
  - NMHC (total hydrocarbons excluding methane)
  - CO
  - SO<sub>2</sub>
- 

### New Limits

The following table shows the proposed limits and phase in periods.

NO <sub>x</sub>	1.0 kg/MWh	0.40 kg/MWh
PM	0.2 kg/MWh	0.02 kg/MWh
NMHC	1.3 kg/MWh	0.19 kg/MWh
CO	3.5 kg/MWh	-
SO <sub>2</sub>	ULSD 15ppm*	-

\*Ultra-Low Sulphur Diesel, maximum 15ppm sulphur content

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### Who is Impacted

The application of the limits will be done through the CofA process. The MOE has identified that the new limits will apply to facilities that:

- participate or are considering participating in the Ontario Power Authority's Demand Response III (DR3) program or similar programs.
- use on-site generators for "peak shaving" or "peak clipping" periodically during high electricity system demand for the purpose of reducing electricity costs to the user or to sell electricity to the grid.
- use or are considering installing a generator to meet all or a portion of the electricity required for that facility.

These limits will not apply to:

- off-grid communities;
- facilities for which diesel generation is the primary source of electricity;
- situations where an operation is exempt from requiring a CofA.

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### Helpful Web Links

<http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyNDM3&statusId=MTU2ODIw&language=en>

[http://www.ene.gov.on.ca/envision/env\\_reg/er/documents/2009/010-2463.pdf](http://www.ene.gov.on.ca/envision/env_reg/er/documents/2009/010-2463.pdf)

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### How can LEHDER Assist?

LEHDER has a core expertise in developing and maintaining emission inventories. We can assist clients with the proposed limits by performing an assessment of existing or planned emergency generators and if necessary suggest measures to be taken based on our findings.

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### Questions

For further information or questions regarding this matter please contact:  
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### About LEHDER

LEHDER is one of the largest Air Quality Management consulting companies in Canada. Our team of consulting professionals is built around our core strength in industrial environmental, health and safety management. LEHDER recognizes our client's need to make decisions that provide for operational flexibility while meeting regulatory, economic and social requirements.

Visit our web pages at [www.lehder.com](http://www.lehder.com)

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**Tell us about yourself**

Please circle ONE in each of the following categories

How many employees are in your organization / company:

- A 1-5      B 6-19      C 20-49      D 50-99  
E 100-250      F 251-499      G 500+

Which of the following **most accurately** describes your workplace's **primary business activity**:

- A Automotive      B Chemical      C Construction      D Education  
E Electrical      F Food      G Forest Products      H Government  
I Health Care      J Manufacturing      K Mining      L Municipal  
M Office Services      N Petroleum      O Pharmaceutical      P Railroads  
Q Retail      R Steel Industry      S Transportation      T Other: \_\_\_\_\_

Which of the following **job responsibilities most accurately** describes your position:

- A H&S & Env Manager/Coordinator      B Plant or Prod. Manager  
C Purchasing Manager/Buyer      D Manager / Supervisor  
E Senior Mgmt / Owner      F Human Resources      G H&S Consultant  
H Sales / Marketing      I Medical / EMS      J Technical Specialist  
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N Worker      O Other: \_\_\_\_\_

Are you a JHSC Member?      Yes      No

Do you make or influence health & safety buying decisions for your business?  
Yes      No

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