



**BLUE SKY ENVIRONMENTAL LLC**

July 1, 2008

Mr. John Therriault, Assistant Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph, Suite 11-500  
Chicago, IL 60601

**Subject: R2007-19 (Rulemaking – Air)  
Section 27 Proposed Rules for Nitrogen Oxide (NO<sub>x</sub>) Emissions from Stationary  
Reciprocating Internal Combustion Engines and Turbines: Amendments to 35 ILL.  
Adm. Code Section 201.146 and Part 217**

Dear Mr. Therriault:

Please accept these comments regarding Section 27 Proposed Rules for Nitrogen Oxide (NO<sub>x</sub>) Emissions from Stationary Reciprocating Internal Combustion Engines and Turbines: Amendments to 35 ILL. Adm. Code Section 201.146 and Part 217. It is understood that the deadline for filing comments regarding this proposed rule via R2007-019 has not yet been set but comments can presently be submitted.

It is recommended that the definition of emergency or standby unit in Section 211.1920 be amended to include the operation during PJM's Emergency Load Response Program ("ELRP"). The ELRP exists in order to prevent brownouts and blackouts. Numerous states now allow emergency engines to participate during such times (as opposed to waiting for a blackout), principally because studies prove that it is better to prevent a blackout by using a subset of emergency generators for a short period of time as opposed to losing the grid, which would mean all emergency generators in the state operating for many hours or possibly days. Generators operating in the ELRP will not be synchronized with the grid. The engines will simply be turned on when PJM declares an emergency under the PJM Program, thereby lessening the need for more power on the grid.

The ELRP is activated according to the procedures in the PJM Manual 13 Emergency Operations for a PJM Declared Emergency. A "PJM Declared Emergency" means a condition that exists where the PJM Interconnection LLC notifies electric distributors that an emergency exists or may occur and it is necessary to implement the procedures in the PJM Manual 13 Emergency Operations. The ELRP has rarely been declared – it is truly reserved for emergency situations.

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This declaration should not be confused with other PJM programs that are enacted for economic reasons (e.g., economic demand response or "peak shaving"). In the past five years, the ELRP has only been called five times for a total of 20 hours. A summary of the ELRP Event Hours is as follows:

Year	Events	Duration (Hours)
2003	0	0
2004	0	0
2005	July 27	4
	August 4	3
2006	August 2	4
	August 3	5
2007	August 8	4

Section 211.1920(a) of the Illinois air regulations (amended at 31 Ill. Reg. 14271, effective September 25, 2007) defines "emergency or standby unit" as a stationary gas turbine or a stationary reciprocating combustion engine that

Supplies power for the source at which it is located but operates only when the normal supply of power has been rendered unavailable by circumstances beyond the control of the owner or operator of the source and only as necessary to assure the availability of the engine or turbine.

I interpret this definition to mean that emergency engines should only be operated after "lights out." The PJM ELRP is the last panic button that can be pushed before voltage reductions and brownouts/blackouts. Therefore, engines participating in the ELRP would be operated just before "lights out." I recommend that the following be added to Section 211.1920

An engine that operates during an emergency condition according to the procedures in the PJM Emergency Operations Manual for a PJM Declared Emergency. A PJM Declared Emergency means a condition that exists where the PJM Interconnection, LLC, or its successor, notifies electric distributors that an emergency exists or may occur and it is necessary to implement the procedures in the PJM Manual 13 Emergency Operations, as revised.

Operation of emergency engines in the ELRP has been discussed with IEPA. In response to a letter to Mr. Ray Pilapil, the IEPA Compliance Manager, Mr. Charles Zeal verbally responded

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that emergency engines could operate in the ELRP. It is requested that this be formalized in the regulations with the above proposed change<sup>1</sup>.

If you have any questions or require additional information, please do not hesitate to contact me at 617-834-8408.

Sincerely,  
Blue Sky Environmental LLC



Don C. DiCristofaro, CCM  
President

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<sup>1</sup> The Maryland Department of the Environment is currently proposing a similar change to its regulations in COMAR 26.11.09 Relating to NOx Emissions for Fuel Burning Equipment and Emergency Generators via a stakeholder process. The regulation has not yet been formally proposed.