



# Generator Permitting and Compliance

## Make Sure Your Power is Restored

Permit approvals and compliance requirements can be a struggle for owners/operators of non-emergency and emergency standby generators (gensets). GES can support your genset permitting needs, including compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP), the Standards of Performance for Stationary Compression Engines (NSPS) for Reciprocating Internal Combustion Engines (RICE), or Airborne Toxic Control Measures (ATCM) Off Road Compression Ignition Engine Tier standards.

GES supports an average of 40 permitting and compliance efforts for gensets each year. Successful permit authorization is achieved by working closely with regulatory agencies, genset manufacturers, and clients to ensure permit requirements offer maximum operational flexibility. GES senior professionals have a keen understanding of the nuances and intent of regulations, which is a valuable resource for these projects. GES can also provide ancillary environmental permit/approval support as described below.

### **Air Quality Study for CEQA/NEPA**

GES can assist with preparation of technical Air Quality Studies for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) evaluations, which can be triggered by genset construction and operation. This type of study evaluates consistency and conformity with regional air quality plans. Depending upon site/project characteristics and regional CEQA guidelines, the analysis will include a screening evaluation and/or a refined health risk analysis with meteorological air modeling. In the event impact mitigation is required, GES can assist in the selection of mitigation measures.

### **Hazardous Materials Business Plans (HMBP)**

Genset fuel storage and selective catalytic nitrogen oxides (NO<sub>x</sub>) reduction urea/ammonia/diesel exhaust fluid (DEF) storage must be included in a facility HMBP. The objective of an HMBP is to prevent harm to public safety and the environment from the release of hazardous materials through preventative planning and providing site data for emergency responders. GES' geographic information system (GIS) mapping experts are instrumental in accurate site hazard mapping. To ensure accurate HMBP development, GES works closely with facility personnel to identify hazardous materials and design emergency procedures to protect the health and safety of staff and the public.

### **Aboveground Storage Tank (AST) Permitting**

ASTs may be subject to additional state or local permitting requirements that safeguard human health and the environment. Genset fuel tanks may require standalone permits or modification of existing AST permits. Safety design specifications, such as siting considerations, leak detection, and integrity testing, may be required by local jurisdictions before operation is allowed. GES can assist in understanding regulatory requirements and preparation of supporting permit/certification documentation.

### **Spill Prevention, Control and Countermeasure (SPCC)**

Genset fuel storage tank capacity commonly exceeds the Environmental Protection Agency (EPA) SPCC aboveground storage aggregate threshold of 1,320 gallons. GES can assist with identifying applicable requirements and prepare SPCC Plans meeting all applicable requirements of 40 CFR Part 112 for Tier I and Tier II qualified facilities. Depending upon the site characteristics the SPCC plan may be a Tier I self-certification plan, or a Tier II plan requiring a site inspection and Professional Engineer certification. GES' professional staff can assist with the full implementation of SPCC plans, including communication with regulators and training staff.