

# **Setting “Clean” Performance Standards For HEDD Units**

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# Questions to Address

- **Do we need to set different standards for new and existing units?**
- **What should the standards be for new, and existing(?), units?**

# Performance Standards

## Existing HEDD Units

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- Combustion Turbines:
  - natural gas: 0.0400 lbs/mmBTU
  - fuel oil: 0.160 lbs/mmBTU
- Boilers:
  - natural gas: 0.0100 - 0.0500 lbs/mmBTU
  - fuel oil: No. 2: 0.0500 - 0.0800 lbs/mmBTU  
No. 6: 0.150 - 0.200 lbs/mmBTU
  - coal: 0.0700-0.120 lbs/mmBTU

# Performance Standards

## **New** HEDD Units

### Now

- At least be as stringent as performance standards for existing HEDD units, and
- Meet the technology standards in each state at time of permitting
- For example, in NJ those technology standards would be:
  - Minor NSR - SOTA
  - Major NSR - BACT & LAER