



Facts about

Accounting for Emergency Backup Control Equipment in Your PTE

Emergency control equipment is that equipment that is used only in the case of emergency shutdowns or breakdowns. It is equipment that cannot be operated for long periods of time because of economic and physical constraints.

One type of equipment that would qualify as “emergency backup control equipment” would be the equipment that is made available only to control a chemical after a spill.

The question we hear is, “How is this equipment accounted for in calculating potential to emit (PTE)?” The answer is dependent upon whether the equipment’s use is unpredictable or predictable.

Unpredictable Operations

The equipment need not be included in a permit if its use is unpredictable, such as the equipment to control accidental releases mentioned above. The equipment is not used in any PTE calculations.

Note, however, that the permittee may then be in violation of permit terms during the emergency situation.

Predictable Operations

If the use of the equipment is at all predictable, it should be included in a permit. Usually, this use can be viewed as an “alternative operating scenario.”

Assume, for example, that a facility operator wants to be able to continue running process equipment during both emergency breakdowns and scheduled shutdowns of the control equipment. The operator could propose an alternative operating scenario. This scenario would need to meet all applicable requirements in order for the facility to remain in compliance with permit limits.



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