

## **State Regulations Encourage Combined Heat and Power**

**By Peter Corbett, Jared Eigerman and Matthew Kiefer**

**T**he Massachusetts Department of Environmental Protection (“DEP”) has revised its air pollution control regulations to encourage the use of combined heat and power (“CHP”) systems. A facility using a CHP system may now obtain credit for the emissions that would occur if separate heat and power systems were used. The new regulations are intended to reduce fossil fuel use and emissions of greenhouse gas (“GHG”) and other air pollutants.

Existing air pollution control regulations cover a range of commercial and industrial activities that discharge air pollutants, including certain large building heating systems and, in some cases, even emergency generators. DEP permits specify limits for each type of air pollutant.

In a CHP system, a combustion turbine or other engine produces electrical power, and hot exhaust gases are directed through a heat recovery system for heating, cooling, or other purposes. This eliminates the emissions that a separate heating or cooling unit would produce. Also, CHP systems are typically fueled with natural gas, which has a lower carbon content than fossil fuels commonly used in heating systems, thereby reducing GHG emissions.

Adopted earlier this fall, the new regulations allow a CHP system to emit as many pollutants as the sum of the emissions that would be generated by individual heat and power systems of equal output. In addition to saving fuel costs, owners may also avoid or reduce their costs to install pollution-control equipment that would otherwise be required to conform to emissions limits. Once operational, a CHP system must have its emissions tested to ensure they do not exceed applicable emission limitations.

Please contact us if we can help you explore the applicability of these regulations to a particular facility or project.

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