

Prettyman Mark A. (DNREC)

From: SPeltz@Herc.com
Sent: Tuesday, August 03, 2004 11:48 AM
To: Prettyman Mark A. (DNREC)
Subject: Comments Draft 2 of Reg. 44

Mark - As follow-up to our conversation this morning:

Title of Regulation No. 44: Consider changing the title to "Control of Stationary Generator Emissions". While the original impetus for the regulation was "distributed generation" as defined in Section 2, the rule also applies to Emergency Generators as well as Distributed Generators (both defined terms in Section 2).

Section 1.1: In the interest of saying what you mean more simply, consider substituting "stationary generators" for "distributed generation units (i.e., generators)".

Section 2 "Distributed generator": As written, the definition implies that in order to be considered a "distributed generator" the unit must satisfy two conditions - it is used for emergencies, testing and maintenance (all defined terms) and for other (undefined) purposes. Since that is probably not what was meant, consider replacing "is" with "may".

Section 2 "Emergency": Some of the words used to define emergency may merit their own definition. Terms such as "electrical grid", "on-site disaster" and "local equipment failure" may mean different things to different people. Examples are
- Does "electrical grid" refer only to that portion of the electrical transmission and distribution system owned, operated or used by the utility providing power or does it also apply to a customer's internal electrical distribution system?
- Must an "on-site disaster" result in total power loss to a facility or does a partial loss qualify as an "emergency"?
- Does "local equipment failure" include equipment not covered under the definition of "maintenance"?

Section 3.1.1: Can you give an example of what is meant by "good air pollution control practices" that is not already covered by manufacturers instructions and existing regulations?

Regards,

Sol Peltz
Hercules Research Center
Environmental Affairs
302-995-3121

This e-mail and any files transmitted with it may contain confidential and/or proprietary information. It is intended solely for the use of the individual or entity who is the intended recipient. Unauthorized use of this information is prohibited. If you have received this in error, please contact the sender by replying to this message and delete this material from any system it may be on.

