

Prettyman Mark A. (DNREC)

From: SPeltz@Herc.com
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To: Prettyman Mark A. (DNREC)
Subject: Comments on Draft 3

Minutes of Meeting

Regarding use of EPA emission factors: DNREC should identify which factors it allows the regulated community to use. Under the Title V program, AQM is considering mandating stack testing for existing boilers in the 50-100 MM Btu/hr range because it "thinks" the EPA factors may not be sufficiently "accurate".

Documenting compliance with sulfur content at time of delivery: We support requiring fuel oil supplier bill of lading to state the maximum % sulfur and method used for analysis for the fuel delivered. Perhaps DNREC could consider incorporating this requirement into Reg. 8. It would certainly make user record keeping a lot simpler and probably not cost very much for the suppliers.

Draft 3 Comments

1.2.1.3: Italicize "mobile", a defined term

1.4.2.1, 1.4.2.2., and 1.4.2.3: Make this a new subsection since these actually refer to regulatory requirements other than Initial Notification. As written, 1.4.2.2 creates somewhat of a catch-22 since it gives 12 months after effective date, ignoring that Initial Notification is also a requirement of this regulation.

7.3.2: Emission Verification by an Owner: Does the term "any supporting calculations" include allowing the use of EPA (e.g., AP-42) emission factors to verify emissions if existing test data or test data from manufacturing technical data sheets or similar documentation is not available?

Best regards

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