

Prettyman Mark A. (DNREC)

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Sent: Monday, December 13, 2004 8:12 AM
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Cc: eileen
Subject: Draft 3 DG: two long-term concerns

To the Group...Good Morning,

The DNREC staff and members of the Workgroup have worked hard to bring us to this point and I wish to acknowledge it. When adopted this regulation will lower and control atmospheric emissions from "Distributed Generation". Thank you.

I am concerned for two long-term consequences of the proposed regulation: one, lenient long-term NOx emission limits for small distributed generators; and two, no time limit for the higher permitted emissions of existing distributed generators.

1. The long-term NOx requirement for smaller generators is lenient.

Our proposed long-term limits for larger generators (15 MW or more) are okay. These are NOx limits of 0.08 lb/MWh for gaseous fueled, 0.2 lb/MWh for liquid fueled, and 1.5 lb/MWh for waste gas. Also satisfactory are the NOx emission limits for the use of gas that would otherwise be flared and the NOx emissions from Combined Heat and Power operations.

What I object to is the proposed NOx limit of 0.6 lb/MWh for new small (less than 15 MW) generators installed in year 2012 or later.

By comparison, Texas will require in 2005 for small generators (<10MW) that operate over 300 hours/year in their non-attainment areas a NOx not to exceed 0.14 lb/MWh. (Small generators in Texas non-attainment areas running less than 300 hours will be allowed 0.47 lb/MWh).

In California, the limit scheduled to go into effect in 2007 is 0.07 lb/MWh.

The Regulatory Assistance Project model rule recommended a 2012 limit of 0.15 lb/MWh.

2. The permitted higher emissions for existing distributed generators are in force for the life of the generator (unless repowered).

The existing distributed generators, once the initial conditions are met, will then be able to operate indefinitely as long as the equipment lasts. A well-maintained diesel engine can last 40 years. There should be a reasonable phase-out of the permitted higher emissions of existing distributed generators.

See you Wednesday, Seth Ross

P.S. I have copied Eileen Butler, my contact at the Delaware Nature Society.