

## Prettyman Mark A. (DNREC)

---

**From:** msm@dswa.com  
**Sent:** Thursday, May 26, 2005 3:59 PM  
**To:** Prettyman Mark A. (DNREC)  
**Subject:** Draft Regulation 1144

Mr Prettyman,

The Delaware Solid Waste Authority has reviewed a draft of proposed Regulation 1144 and wish to comment.

-suggest DNREC restate the concentration limits on total sulfur and hydrogen sulfide to a more common form i.e. instead of grains per 100 dry standard cubic feet....ppm or mg/l or ppb. -section 3.2.2.2 is too restrictive. virutally no landfill in the state can meet these low sulfur limits. Hence this rule would essentially eliminate the use of landfill gas for distributed energy considering that the cleanest burning technology available for landfill gas generators cannot meet the requirements of 3.2.2.1

-section 5.2 Fuel Requirements - Gaseous fuels -is far too stringent for landfill gas. If you desire these comments in a more formal letter please let me know.

Sincerely

Mark S. Mallamo, P.E., DEE  
Project Manager  
DSWA