

## Prettyman Mark A. (DNREC)

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**From:** Rick B Drazich [Rick.B.Drazich@USA.dupont.com]  
**Sent:** Friday, May 06, 2005 1:09 PM  
**To:** Prettyman Mark A. (DNREC)  
**Subject:** Electrical Generator Regulation

Hello Mark,

Here are a few comments that I had on the regulation discussed at the workshop this past Tuesday.

1. Definition of "fuel burning equipment". Regulation 1 and 12 define "fuel burning equipment". Regulation 30, Appendix A(b) implies that an internal combustion engine is one type of "fuel burning equipment."

These references should be consistent with changes made to Reg 2 Appendix A(b).

2. Since emergency electrical generator fuel tanks are infrequently filled with fuel oil, provisions should be made so that facilities do not have to pump out their fuel tanks of existing fuel in order to comply with the 0.05% Sulfur content requirement. The intent is that any new fuel purchased must comply with the 0.05 % Sulfur content, and this should be clarified.

3. Will it be legal for a person to offer for sale, sell, or deliver fuel oil to an emergency generator with a content of greater than 0.05% Sulfur? The proposed regulation does not seem to address the sellers of distillate oil, only the users. Historically, the DNREC regulations have also addressed the suppliers and deliverers of fuel oils.

4. There needs to be a deminimus capacity for stationary emergency electrical generators, below which the regulation does not apply. If for no other reason than uniform, practical, and fair enforcement of the proposed regulation, there needs to be a minimum capacity. Under the proposed regulation, how would a DNREC compliance engineer determine compliance of a "small" generator that he/she sees located at a site? How will a facility demonstrate the 12-month criterion for small (< 1MMBTUH) portable electrical generators? Also, under the proposed regulation, is a small generator on wheels considered stationary if it is in one location for more than 12-months?

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