

Prettyman Mark A. (DNREC)

From: Horowitz, Alan B [alan.horowitz@astrazeneca.com]
Sent: Monday, August 02, 2004 5:50 PM
To: Prettyman Mark A. (DNREC)
Cc: Galina Chadwick; Whetzel Robert W. (E-mail); Paul Jann
Subject: RE: 6th DG Workgroup Meeting

Mark,

One remaining concern, as expressed to Ali M. and John Blevins during a meeting with the DE Chamber Env. Committee last week, is the need for some clarification and cross-reference between Section 4 of this rule and Reg. 2, Reg. 25 and any future Minor New Source Review rule, specifically with regard to emergency generators. As drafted, this rule does not address two critical issues that are current sources of confusion and uncertainty: 1) the Reg. 2 implications for emergency generators, in light of the unclear status of the DNREC policy statement on emergency generation; and 2) the calculation of PTE for emergency generators. Presumably, Reg. 44 would trump any MNSR regulation since the operational standards are being defined here. However, I believe it makes sense for DNREC to make explicit, preferably in this rule, how PTE should be calculated for purposes of determining the need for a synthetic minor, etc. I recognize there is a divergence in opinion on the appropriate number and I won't address that here, except to say that I believe that the process should avoid the need for formal Reg. 2/synthetic minor permitting (i.e through a general permit a certification program, or the like. I would encourage this issue to be addressed specifically in the next meeting. Unfortunately, I will be unable to attend. Thanks for your consideration.

While I believe Galina plans to follow-up directly, we also spoke to Ali and John about the inclusion of language that would allow emergency generators to be operated when an emergency is imminent. This concept needs to be developed but the notion is to provide operators with some critical flexibility to commence operation before the actual emergency occurs.

Alan

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-----Original Message-----

From: Prettyman Mark A. (DNREC) [mailto:Mark.Prettyman@state.de.us]
Sent: Monday, August 02, 2004 4:06 PM
To: Bill Andrew; Bob Jubie; Burcat Bruce H (PSC); Deramo Alfred R. (DNREC); Galina Chadwick; Howatt Robert (PSC); jbyrne@udel.edu; Klotz Bradley A. (DNREC); Leigh Glover; mbogdan@alade.org; Neilson Kevin S (PSC); Platt Jerry (DOC); Prettyman Mark A. (DNREC); rlbaker28@earthlink.net; satterfield@dpichicken.com; Sebastian Suzanne E. (DNREC); sethross2001@yahoo.com; Smisson Charlie T. (DNREC); suzanne@deha.org; tbrower@udel.edu; Widom, Stu

6/7/2005

Cc: Adams Thurman (LegHall); Horowitz, Alan B; Amirikian Ronald A. (DNREC); Barbara Scoglietti; Biggs Jane (DNREC); Bonini Colin (LegHall); Booth Joseph (LegHall); Brown Michael K. (DNREC); Carey George (LegHall); Carl Melinda S. (DNREC); Carrie Leishman; Caulk Wallace (LegHall); Cherry Philip J. (DNREC); Chesser Kimberly A. (DNREC); Chris Cleveland; Cloutier Catherine (LegHall); Connor Dorinda (LegHall); Cook Nancy (LegHall); Copeland Charles (LegHall); Coyle Kevin F. (DNREC); Dale McKinnon; Daniel Corrigan; David Fehling; David Walczak; Dawn Minor; Dominic Balascio; Don Althouse; Dorothy Abbott-Donnelly; Dr. Paul Sample; Ed Kashdan; Fees David F. (DNREC); Francis J. Wiegand; Gao Frank F. (DNREC); Gary Patterson; Gentry Penny J. (DNREC); George Owens; Gilbert Holt; Hall-Long Bethany (LegHall); Hill William (DNREC); Hocker Gerald (LegHall); Jack Sipple; Jack Lebeau; James L. Cabbage, Jr.; James Newton; James Sadowski; Jeff Deats; Jerry Kissel; Joe Polidoro; Joe Suchecki; Joel Bluestein; John J. Casey, Jr.; John Jimison; Karl Auwarter; Kevin Snape; Kreiner Andrea (Governor); Larry Reinhart; Leslie Witherspoon; Lex Grier; Makeba Morris; Malenfant Ray H. (DNREC); Mann Amy (DNREC); Marshall Robert (LegHall); Marty Ross; Marvin C. Sharp; Matt Urban; McBride David (LegHall); McDaniel William (DNREC); McDowell Harris (LegHall); Merrily Gere; Michael Keller; Michele Roberts; Mike Defino; Mike Gray; Mirzakhaili Ali (DNREC); Mulrooney Michael (LegHall); Mulrooney, Robert; Nathaniel Greene; Patrick McCullar; Paul Cunningham; Paul Jann; Pete Heimlicher; Peterson Karen (LegHall); Pettingill Gene (DNREC); Plant Hazel (LegHall); Ray Stevens; Rep. George Robert Quillen; Rep. John C. Atkins; Rich DesJardien; Rick Weston; Robert C. Jones, Jr.; Russ Ehrlich; Sandra Burton; Scuse Michael (DDA); Sean Mackay; Senator George H. Bunting; Senator Robert L. Venables; Simpson Gary (LegHall); Snead James (DNREC); Sol Peltz; Steve Seip; Stevens Stacey A. (DNREC); Taggart Robert (DNREC); Taylor Maria A. (DNREC); Terranova Nancy (DNREC); Terry Little; Thornburg Pam (LegHall); Tim French; Tom Frankiewicz

Subject: 6th DG Workgroup Meeting

The next meeting of the DG Regulation Development Workgroup is scheduled for **Monday, August 16, 2004** from 1:00 to 4:00 PM. The meeting will be held at the Dover Division of Motor Vehicle (DMV) 2nd floor conference room (same room as last meeting). Attachments to this email include:

1. 8/16/04 DG Workgroup Meeting Notice/Agenda
2. Regulation No. 44 (Draft 2), Delaware's DG Regulation

Please email/send written comments and suggestions on the draft regulation before Friday, August 20, 2004.

The written comments received on this second draft, and comments/issues discussed during the 6th meeting, will be used to develop a third draft of the regulation. Unless there are significant issues which the workgroup feel are necessary to discuss further, the 6th meeting will be the final meeting for the DG Regulation Development Workgroup. AQM will then begin the next steps in the regulatory development process, to include holding a Public Workshop and a Public Hearing, using the third draft as the proposed distributed generation regulation. Please be prepared to discuss this path forward, for proposing and adopting the distributed generation regulation, at the upcoming meeting.

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