

**Prettyman Mark A. (DNREC)**

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**From:** Suchecki, Joe [jsuchecki@emamail.org]  
**Sent:** Wednesday, December 08, 2004 2:16 PM  
**To:** Prettyman Mark A. (DNREC)  
**Subject:** RE: 7th Distributed Generation Workgroup Meeting

Mark,

Thanks for the information on the revised rule and workshop meeting. Unfortunately, I have another meeting already scheduled that day and will not be able to make it to Delaware.

A quick review indicates that the new proposal looks good. There are just a couple of questions that I have and perhaps one comment. I have sent a copy to my members for their review and comment, and I will provide written comments to you before the meeting.

The only issue I saw that is of some concern is with the emission standard for waste gas engines. You have left that at 1.5 lbs for NOx, and it doesn't make sense to have a waste gas standard that is lower than the standard for other DG, i.e.e., 2.2 lbs. Since the quality of waste gas fuels is less consistent and not as good as pipeline natural gas, it is more difficult for engines burning waste gases to make that emissions standard, and since those engines are doing "good" by producing power from gases that would otherwise be released or flared, they should not have to achieve a lower emission standard.

Thanks for all your efforts on this.

Anyway, I'll work on getting something to you on this version, but in general it looks good to us.

Joe Suchecki  
EMA