

Prettyman Mark A. (DNREC)

From: SPeltz@Herc.com
Sent: Tuesday, June 15, 2004 10:40 AM
To: Prettyman Mark A. (DNREC)
Subject: Re: 5th DG Workgroup Meeting

Mark,

I verbally conveyed these comments on the draft to you awhile back but thought it worthwhile to just put them in writing for you as well.

Regards,
Sol

Section 2.0 Definitions:

"Emergency" - Is the intent to apply this term to unplanned power interruptions?

"Emergency Generator" - The definition refers to use during "an emergency, during testing, or for maintenance purposes". Can we make clear that these words apply not only to the generator set itself, but also to planned power interruptions so that repairs or preventive maintenance can be made to other local equipment before they actually fail interrupting power to critical facility operating systems. An example might be preventive maintenance on an internal substation feeding a boiler necessary for production or safety. See Section 4.1 comment.

May be helpful to discuss and add definitions of "testing" and "maintenance"

Section 4.0 Operating Requirements:

Section 4.1:

- Make clear that this provision applies not only to the generator set itself, but also to planned power interruptions so that repairs or preventive maintenance can be made to other local equipment before they actually fail interrupting power to critical facility operating systems.
- How was the 50 hour limit arrived at? Some generator reliability testing while on load requires that the generators be run for some period of time to prevent overheating of associated equipment due to short intervals between startup and shutdown as well as to minimize the "short car trip" effect on the generators themselves.

Section 4.2: Shouldn't there be the word "emergency" before "generator"?
Is the unlimited use subject to any other requirements, e.g., getting a Reg. No. 2 operating permit?

Section 4.3: Shouldn't there be the word "emergency" before "generator"?

Section 5.0 Fuel Requirements

Section 5.2: What is the rationale for limiting biodiesel blends to B5 or greater?

Section 6.0 Record Keeping and Reporting

Section 6.1: What generator's are the target of this section? Section 6.1.1 seems to specifically exempt emergency generators while Section 6.1.2 appears to apply to any generator.

The record keeping requirements as written do not seem practical, particularly for residential use of generators. Can you really imagine people keeping the required records for any period, let alone 5 years? Is DNREC planning to enforce by inspecting homeowners' records of fuel usage and operating hours?

Can't the Department get the information it needs by using alternative information sources? For example, if consumers can only buy diesel fuel and generators that meets the new standards why burden them further? Existing generators will either be running on the new fuel or be gradually replaced. Is the next step to require consumers to keep a log of how much fuel is burned in their home heating systems?

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Subject: 5th DG Workgroup Meeting

The next meeting of the DG Regulation Development Workgroup is scheduled for Wednesday, June 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. 6/16/04 DG Workgroup Meeting Notice/Agenda
2. Regulation No. 44 (Draft 1), Delaware's DG Regulation

Written comments and suggestions on the draft regulation will be accepted through Friday, June 18, 2004.

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<< Attachment Removed: Meeting Notice 6-16-04.doc>> << Attachment Removed: Regulation 44 Draft 1.doc>>

