

Prettyman Mark A. (DNREC)

From: Daniel J. Corrigan [dcorrigan@demecinc.net]
Sent: Thursday, May 05, 2005 10:52 AM
To: Prettyman Mark A. (DNREC)
Subject: Re: Draft 4 of Regulation 1144 (formerly Reg. 44)

Mark,

Just a reminder from a comment that was made on Tuesday night, that I had not thought about before and that is the one dealing with the lower sulfur diesel fuel. I think it should be as such that after a certain date you must show that any oil purchased has a sulfur content below the value stated in the regulation whether the data is provided by the supplier of a sample of the shipment is irrelevant and the sulfur content of the fuel in the tank should not be held against the owner as long as samples of the tank show a decrease from tank sample before the reduced value of the sulfur content. I am sure this is incoherent but the reason I think that tank sampling of existing tanks should not be held to the same level as new or shipment value is two fold. My emergency 750kw diesel generator has a 300 gallon tank. Historically we have operated it when our tie breaker to the grid has mysteriously opened until we could figure out what happened and close that breaker (Since then we have added a second feed to our facility from a different connection to the grid it actually back feeds us through the Town of Smyrna's electric.) Other than that we run it approximately 15 minutes a month (engine only no load) per owners manual and annually we perform a black start test where we pretend that the grid has failed and they required us to start the unit. (approximately 2 hours of run time) it will take a long time for us to use those 300 gallons of diesel fuel.

My second concern is if and when you have a similar requirement on my CT. I have a 250,000 gallon fuel oil tank that currently has about 125,000 gallons in the tank with a tank sampled value of 0.043% sulfur. We only use that fuel when natural gas is not available to us. We usually fill the tank in the fall and partial refills as needed throughout the winter. If we have an extremely mild winter we could possibly not run on diesel at all and if we don't run we don't refill so let's say that we have a half tank of diesel at 0.043% the regulation now wants us to have a 0.015% and we fill the tank with 0.012% our tank will be above 0.015% .

I guess what I am really saying is that owners should be viewed as compliant if they can prove that the fuel supplied after the effective date of the sulfur percentage change meets the requirement regardless of what the tank sulfur content is as long as it is below the previous standard and after each subsequent shipment on new fuel it continues to decrease.

Hope this make sense.

Daniel

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

From: [Prettyman Mark A. \(DNREC\)](#)

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Sent: Monday, May 02, 2005 9:47 AM

Subject: FW: Draft 4 of Regulation 1144 (formerly Reg. 44)

Hello again,

I wanted to let everyone know the room numbers where the public workshops will be held at the Del Tech campuses. The workshop at the Stanton campus on May 3 will be in Room A116. The workshop at the Owens campus on May 4 will be in Room 535A in the William Carter Partnership Building. Thank you.

Mark

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The views and opinions of the authors expressed herein do not necessarily state or reflect those of the Department of Natural Resources & Environmental Control or the State of Delaware.

From: Prettyman Mark A. (DNREC)

Sent: Monday, April 18, 2005 11:37 AM

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Rick Weston; Robert C. Jones, Jr.; Robert Taggart; Russ Ehrlich; Sandra Burton; Scuse Michael (DDA); Sean Mackay; Senator George H. Bunting; Senator Robert L. Venables; Simpson Gary (LegHall); Small David (DNREC); Snead James (DNREC); Sol Peltz; Steve Corazza; Steve Seip; Stevens Stacey A. (DNREC); Taylor Maria A. (DNREC); Terranova Nancy (DNREC); Thornburg Pam (LegHall); Tim French; Tom Frankiewicz
Subject: Draft 4 of Regulation 1144 (formerly Reg. 44)

Hello everyone,

Since the last Distributed Generation Regulation Development Workgroup meeting in December, I have been gathering comments on Draft 3, and revising Draft 4 as necessary. One primary difference in the latest draft regulation which you may notice is that Regulation No. 44 has now been renamed Regulation No. 1144 to reflect the new numbering standard of Delaware regulations. Regardless of the name change, the draft regulation is the same which has been discussed throughout the Workgroup's meetings. The second difference in the draft regulation is that it no longer applies to combustion turbines. Air Quality Management has been meeting with Conectiv and other "power plants" throughout the state, and has agreed to exempt combustion turbines from Regulation 1144, but will address them in a similar, concurrent regulation.

Now that the DG Workgroup meetings have concluded, I am beginning the next steps in the regulation development process, which shall include holding public workshops. As some of you may have seen, a notice for the upcoming public workshops (also attached) was posted in Delaware newspapers this past Sunday. The dates, times, and locations of these public workshops are as follows:

Workshop #1	Workshop #2	Workshop #3
Tuesday, 5/3/05 6:00 – 9:00 pm Del Tech Stanton Campus Stanton, DE	Wednesday 5/4/05 6:00 – 9:00 pm Del Tech Owens Campus Georgetown, DE	Thursday, 5/5/05 6:00 – 9:00 pm Priscilla Building 156 S. State St Dover, DE

Thank you again, to all Workgroup members, other meeting participants, commenters, and everyone else who has helped in developing the draft regulation. Your input and comments have been greatly appreciated. As always, please feel free to contact me with any questions you have about the draft regulation, or about the upcoming public workshops. Thank you.

Mark

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