



# OTC Model Rules: Review of Stakeholder Comments

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## OTC Committees Meet

- Three draft model rules put forth by the Stationary/Area Source Committee:
  - Stationary generators
  - HEDD turbines
  - Low solvent degreasers
- Comments invited by September 30, 2010.
- Comments may still be submitted.

# CT Stakeholder Comments: Stationary Generator Model Rule

- Blue Sky Environmental LLC, ENERNOC, Department of Defense
- Comments, in general:
  - Allow for emergency engines participating in emergency demand response programs to be classified as emergency engines; make intent clear throughout the model rule by distinguishing emergency and non-emergency demand response.
  - An emergency generator *and its related electrical components* should be allowed to operate during an emergency.
  - The definition of “stationary” should be consistent with 40 CFR 89, including seasonality requirements.
  - The emissions limits for non-emergency units are too stringent.
  - Unit registration is not necessary.
- Comments also received from Engine Manufacturers Association and U.S. Department of the Navy (Region III)

# CT Stakeholder Comments: HEDD Turbines Model Rule

- Comments from Waterside Power
- Comments, in general:
  - Revise startup and shutdown definitions to allow for the different operational requirements of different turbine types.
  - The output-based emissions limitations were developed with inaccurate assumptions. The input-based limits should be revised to be equivalent to the concentration-based limits or deleted.
  - A rolling 24-hour averaging time should be used for compliance in- and outside of the ozone season.
  - Alternatives to the manufacturer's recommended maintenance schedule should be allowed.
- Comments also received from National Grid, New Generation Biofuels, RRI Energy

# CT Stakeholder Comments: Low Solvent Degreasers

- No comments by CT or other stakeholders on this model rule.
- CT stakeholders did comment on the concept papers in September 2009.
- If no comments received, OTC SAS Committee assumes there are no significant issues.
- If you have concerns, comments may still be submitted.

# More Information

- Draft model rules are available on the OTC website:

<http://www.otcair.org/document.asp?fview=meeting>

- Additional comments may be submitted to Anna Garcia, OTC, Hall of States, 444 North Capitol St., Suite 638, Washington, DC 20001; [agarcia@otcair.org](mailto:agarcia@otcair.org)