STATE OF MISSOURI
Bob Holden, Governor - Stephen M. Mahfood, Director
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

DEC 1 9 2001

Mr. Rick Weston
The Regulatory Assistance Project
50 State Street, Suite 3
Montpelier, VT 05602

RE: Comments to the Model Regulations for the Output of Specified Air Emissions From Smaller-Scale Electric Generation Resources

Dear Mr. Weston:

On behalf of the Missouri Department of Natural Resources' Air Pollution Control Program (APCP), we thank you for the opportunity to provide comments on the "Model Regulations for the Output of Specified Air Emissions From Smaller-Scale Electric Generation Resources " published November 2001.

The APCP wishes to provide comment on several aspects of the proposed model rule, as follows:

1. Chapter II, Section II(E) and IV(A): The APCP believes that the limit of 300 hours of operation per year for emergency power generators is too restrictive. We suggest that a limit of 500 hours per year be used, which would make it consistent with the U.S. Environmental Protection Agency limit for calculating Potential to Emit from emergency power generators.

2. Chapter III, Section B. Emissions: The APCP has several comments to this section.

   A. The APCP agrees that carbon monoxide emissions be regulated, and believes the rationale should emphasize the negative health effects. The role of carbon monoxide in the formation of ground-level ozone is much less important than other factors (VOC, NOx, hours of sunlight, etc).
   B. The model rule assumes that emergency generators are diesel fueled and that the potential emissions from these sources are not considered a significant problem. However, numbers supplied by Reciprocating Internal Combustion Engine Workgroup of the Coordinating Committee of the Industrial Combustion Coordinated Rulemaking indicate that of the 28,200 engines in

their study, 5,700 are categorized as emergency power units, 15,000 spark ignition, 4,600 compression ignition and 2,900 small engines (200 brake horsepower or less). This workgroup found that Emergency power units can be fueled by gasoline, diesel, or natural gas and may have a significant contribution to emissions. Those emissions include sulfur oxides and hazardous air pollutants including formaldehyde.

3. General Comments: The APCP believes that controlling new small-scale electric generators will achieve some emission benefits and applaud this effort. We understand the cost concerns with retrofitting existing small-scale electric generators. However, the only effective way to control volatile organic compounds and select hazardous air pollutants is to retrofit with select catalyst control devices.

If you have any further questions regarding this matter, please contact me at the above address or call (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Roger D. Randolph
Director

RDR:dcs