From: Bumar, Rich
To: Costello, Martin
Subject: Epcot Generator Comments
Date: Tuesday, November 06, 2012 4:47:24 PM

Section E.7(c): "Time spent during idling and startup must be minimized. Startup time must not exceed 30 minutes." Does "must not" mean the same as "may not"? i.e. is the 30 minutes a hard limit or is merely a strong suggestion? It also seems to conflict with the 2-in-24 hour provision of Section E.11. If we're at idle while trouble-shooting a problem, E.7(c) says we can't run for more than 30 minutes at a time whereas E.11 by itself would allow us up to 2 hours of continuous trouble-shooting time.

I would much rather see the 30-minute limitation tied to "non-malfunction" status, i.e. normal start-up and shut-down rather than the blanket prohibition it seems to be.

Note: What's going to happen to these provisions if and when the 2-in-24 hour allowance goes away. I know that's a current topic for KKKK not RICEs but it could extend over.

Section E.19 has a typographical error on line 3 which says "...after the compliance date of May 3, 2012..." This should read "2013".

Section E.19 seems to conflict with Section E.26: Section 19 gives us until October 31, 2013 to conduct initial compliance test. Section E.25 gives us 60 days after initial compliance test to submit test results. Section 26 says we have to submit our first compliance report no later than July 31, 2013. BUT, it's all a moot point if we install in Jan/Feb 2013 and do our initial test then and submit test results within 60 days.

Please note the new phone number below.

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