

Re: Advance Clean Car II

Robert Bell <ra_bell3@yahoo.com>

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To: Krall, Kyle (DNREC) <Kyle.Krall@delaware.gov>

Kyle,

I have recently become aware of your/DNREC plan for amending DelCode to per California's ACCII.

I have some questions:

- First, where may I preview the specific, proposed amendments to DelCode?
- I'd like to see the raw data for the slides in the presentation, <https://documents.dnrec.delaware.gov/Air/regulations/under-development/workshop-presentation-low-emission-vehicle-program-dec-13-15-2022.pdf>.
- Re: slides 10-13, does Delaware have only 7 O₃/ozone monitor stations? The airmonitoring website shows 9. I don't know that it matters too much, because what I'd like to understand is how you determine CHG emission from transportation, given all other potential sources, from 7-9 monitoring stations, especially when there's a heavy bias to NCC (Kent/Sussex have 1 and 2 respectively). Can you please provide the data for this?
- What is DNREC/GSS-Fleet's plan to replace the state's ENTIRE fleet?
- What are upstream power requirements for charging stations? Will suppliers be required to be zero-emission as well? If its anything other than "fossil-fuel free" you are just moving the problem.
- What is DNREC's position and plan to deal with EV batteries?
 - When EVs are involved in accidents and/or catch fire, otherwise become unstable.
 - That must be replaced for age, etc? EV batteries are significantly more numerous and dangerous than standard wet-cell batteries in current vehicles. You'd better have a plan.

Why is DNREC trying to push Delaware into the same category as California, when by your own slide-deck, we have to adopt their exact standards? I think the 2014 emission bar was much lower; you/DNREC are arguing now for Zero-emissions. To achieve this goal the lowest income Delawareans will eventually be forced to make terribly difficult decisions, such as: pay for new ZEV car loan, or pay a mortgage; whether

