

From: Marks, Steve (GE Consumer & Industrial)  
Sent: Thursday, October 07, 2004 3:31 PM  
To: Art Williams  
Subject: GE comments on STAR program  
Importance: High

Attached please find, for your consideration, GE's initial comments on APCD's proposed new STAR regulations. As explained in more detail in the attachment, GE urges the Board not to proceed with the formal rulemaking process at this time. While we favor a stakeholder process to evaluate the appropriate approach to air toxics regulation in Jefferson County, at a minimum the District needs to provide additional time to evaluate such a far-reaching and complex proposed program. We have had just two weeks to digest this draft proposal. An additional 30 days is simply insufficient to provide the meaningful comment that such regulations require.

We believe that, if adopted, the proposed program would have substantial adverse economic effects on Jefferson County. Furthermore, the program lacks any recognition of de minimis emissions and exaggerates risk to the extent that resources will be spent in areas for which emissions are already below levels that are protective. The scope and complexity of these requirements has not even begun to be fully considered by the drafters of the rule or the Board.

At this point, we are hopeful that you will exercise your authority to slow down this process and send it back for further review. Technical questions must be answered. Ambiguities should be clarified. Regulated facilities need an opportunity to make plans for compliance. Given what's at stake, it's much more important that we take the time to ensure a workable and protective approach to air toxics regulation. Thank you for your consideration.

<<GE STAR comments\_ltr\_Oct 7\_final.doc>>

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