

Hi Art,

EPA Region 4 would like to recognize the efforts of you, your staff, and the Louisville community that have led to the STAR program draft regulations. As a community, you have been proactive, working together to understand and find solutions to air toxics issues. The collaboration among the District, Community, and Industry over the course of the last several years resulted in the West Louisville Air Toxics Study, the Risk Assessment, and the Risk Management Plan which form the sound technical and community involvement bases for the STAR program.

We believe the District should be congratulated for moving beyond the typical paradigm to develop:

- a risk-based air toxics program that considers the impact of multiple pollution sources on a community, including the provision for new regulations for area sources
- a flexible regulatory approach that may allow higher emissions from individual facilities following public consideration and approval by the District
- an approach that treats excess emissions as violations regardless of when they occur
- provisions for collection of detailed emission information that will support a modeling approach to risk assessment

In keeping with the history of this effort, we are certain that the community will wish to comment on the proposed regulations. The regulations are complex, and in order to support the community's review, we suggest that a table of contents be developed, and that a preamble be included that describes the flow, intent, and rationale for the provisions of the proposed rules. We expect the community to be pleased with this draft, and have attached a list of comments specific to the different draft regulations.

We applaud you and the Louisville community for persisting with this prolonged effort to assess your air toxics issues and to manage them. As always, we offer our continuing support for the process.

Take Care,
Paul Wagner
Air Toxics Assessment and Implementation Section
EPA Region 4