

From: Denny Larson
Sent: Thursday, November 04, 2004 11:17 AM
To: Williams, Art (APCD)
Subject: STAR and Upsets and Monitoring

Dear Art,

Thank you for keeping us in the loop and sorry I missed you when I was in Louisville last week. Tim Duncan and I had a fruitful meeting with Jon Trout however.

We are busy marshaling all sorts of regional and national support for the STAR program.

I hope you and your legal team had a chance to review the reports by the Env. Integrity Project, "Gaming the System" about off the books upset pollution. This is a big problem in Louisville and coupled with the lack of adequate real time monitoring at the fenceline and for investigating odors etc, I am afraid the APCD is seriously miscalculating in its total approach.

STAR is great and we will fight for its un-watered down adoption. But STAR alone won't solve Louisville's problems and protect the people in Rubbertown while it takes years to implement.

In short, the industries are having large and frequent upset releases and ventings of toxic gases directly to the atmosphere (not even through the flares). These releases are illegal under the Clean Air Act and could be fixed and enforced against immediately if your agency had the proper monitors to track them to the source.

Agencies and NGO's have used the CEREX hound to accomplish this quite easily and we hope you will get this equipment on the ground and in use there asap. In addition the new software makes the data instantly readable and understood by the ordinary person. And now it can be posted to a web site in real time as well.

But we're not going to wait to take action ourselves. Within the next 30 days, we will deploy a hound to REACT for their use in tracking odors and upsets. The data will be made available in real time on the web.

I hope you will agree that if REACT can make it happen, so can the APCD. You have the money from EPA and if your inspection staff needs training - then EPA can and will get you that as well.

I look forward to your response and prompt action.

Sincerely,

Denny

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