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To: John F. Morrall III/OMB/EOP@EOP
cc:
Subject: Reform the New Source Review Rule!

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Office of Management and Budget Office Information and Regulatory Affairs
Office of Information and Regulatory Affairs, OMB, NEOB, Room 10235 725 17th Street, NW,
Washington, DC 20523

Office of Management and Budget Information and Regulatory Affairs:

The current NSR program impedes industries' ability to make continuous improvements to their facilities, processes and products.

Manufacturers are uncertain about whether and how to invest in projects that improve productivity, advance energy efficiency and enhance environmental quality.

NSR stops projects that enhance energy efficiency, affordability and reliability. NSR prevents projects that control and prevent air pollution. Regulations should not provide disincentives to these goals.

Time delays and costs associated with the NSR program unnecessarily inhibit the ability of businesses to compete in domestic and international markets.

The EPA should propose a definition of routine maintenance, repair and replacement (RMRR) that accurately and fairly reflects the types of RMRR activities that are routine within specific industries.

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NSR has the potential to add tens, and perhaps hundreds, of billions of dollars in direct and indirect costs to American industry.

Sincerely,

Larry T. Alexander
Director of Environmental and Quality Control
Alamo Cement Company