



Patrick Bennett <pbennett@imaweb.com >
05/07/2002 03:01:39 PM

Record Type: Record

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

Patrick Bennett
Director of Environmental Affairs
Indiana Manufacturers Association
P. O. Box 82012
Indianapolis, IN 46282

May 7, 2002

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.

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.

The EPA should propose a more realistic emissions increase test to determine whether a non-routine activity constitutes a "major modification"; subject to NSR applicability.

Sincerely,

Patrick Bennett
Director of Environmental Affairs
Indiana Manufacturers Association