



Ajay Kumar <ajay.kumar@holcim.com >
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To: John F. Morrall III/OMB/EOP@EOP
cc:
Subject: Reform the New Source Review Rule!

Ajay Kumar
Manager, Env. Affairs
6211 N. Ann Arbor Street
Ann Arbor, MI 48108

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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:

1. NSR is vague and vulnerable to different interpretations

The existing NSR program is vague and relies heavily on individual's interpretation. It is very likely that one will get different answers from different permit writers or enforcement individuals on a given issue. This is what makes NSR very complicated, confusing and frustrating.

2. NSR delays projects and hurts US business

To get approval from EPA for projects is a very tedious process due to NSR. Even if a project will clearly reduce overall emissions, increase energy efficiency, result in savings of our natural resources, the NSR program will either delay a given project by years or the project will never be approved. When one is dealing with NSR, at times one feels "commonsense" approach does not work under this program. The way our counterparts get permits in Europe is much simpler and faster. US business, thus, is being hurt badly as manufacturing facilities here can't move fast due to permitting related (NSR) complications.

3. Increase pollution to get permits faster under NSR

The way NSR works, one can increase emissions for a year or two to establish a higher emissions baseline and then avoid going through NSR and show that emissions will decrease in the future because of a given project. The way emissions baseline is set does not make sense.

4. Some NSR issues could not be resolved even after 10 years

We have **NSR** issues pending with the agencies for many many years without any resolution. **As** the rule is not very clear and has a lot of vagueness, permit writers can't decide what to do or how to handle the issue.

5. Use Keep it Simple Approach

Give facilities emission limits (stack) and set some clear guidelines (if investment is above say \$500k or \$1 million) how one can trigger a major permitting process. Please keep the criteria and guidelines simple. US manufacturing can reduce emissions significantly, if given a fair chance.

Sincerely,

Ajay Kumar
Manager, Env. Affairs