From: Lee Fortier
To: AQFeb2011Rules
Cc: INAHARA Jill
Subject: PM2.5/GHG Hearing Presentation Comments
Date: Wednesday, November 24, 2010 11:16:14 AM

Hello Jill,

Thank you for taking the time to explain the new $PM_{2.5}$ & GHG rule proposals. While these new rules will have a significant impact on our regulatory permit tracking and reporting, my main concern is over the baseline approach chosen by the Department. One of the most significant issues proposed for the new rules is the establishment of the baseline year for $PM_{2.5}$. As discussed at the hearing, we recognize that for some industrial sectors the years 2006 and 2007 may represent normal, pre-recession operations. However, other companies trailed into recession later. Therefore, we see no rational basis for choosing a specific year (or two years) as the default baseline with no opportunity to rely upon a more representative year. We understand that the Department is considering allowing the discharger to choose a year between 2000 and 2010. We see no reason not to choose this approach so long as the source commits to the year and does not change it once the year is elected. Further, the Baseline Emission Rate calculation will have different impacts to all dischargers. We would favor one that provides the greatest flexibility to all permittees.

Dry Creek Landfill built a $6,000,000 landfill gas to energy facility that initiated operations in the summer of 2007. Operations from that point forward will represent the source of our emissions for the probable life of the landfill. To force us to choose a baseline year other than 2008, when all startup issues were resolved, could place the operation of a very expensive "Green Energy" facility in jeopardy.

Thank you for the opportunity to comment on the proposed rules. Lee

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