

US EPA ARCHIVE DOCUMENT

# CBIA

Connecticut Business & Industry Association

July 11, 2005

Mr. Jeffrey R. Holmstead  
Assistant Administrator  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Mail Code: 6101A  
Washington, DC 20460

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Re: CAIR: Request for Reconsideration

Dear Administrator Holmstead:

On behalf of the Connecticut Business and Industry Association (CBIA) and our 10,000 member companies, I am writing to request a reconsideration of EPA's final decision regarding the Clean Air Interstate Rule (CAIR) based upon the following:

1. No public hearing was held regarding the methodology used by EPA to revise the allocation numbers;
2. Connecticut wound up with allocation levels significantly inconsistent with those originally proposed by EPA and without, in our view, adequate technical justification for those changes;
3. The allocation levels are inconsistent with those agreed to by CT, MA and RI through a memorandum of understanding;
4. Adjustments in the final rule appear to be intended to favor states with higher coal usage. This approach has the result of penalizing facilities in the northeast – the area where the most significant investments have already been made by industry and the most significant environmental progress has been achieved; and
5. The definition section of the final rule suggests the inclusion of resource recovery facilities in the program. This would have the effect of further penalizing northeast energy generation facilities and further limiting the allowable emissions from critical northeastern power plants.

For the above stated reasons, CBIA requests that EPA reconsider its final rule-making in this matter.

Sincerely,



Eric J. Brown  
Associate Counsel