

US EPA ARCHIVE DOCUMENT

Mr. Robert L. Rhodes, Jr.
Chair, National Advisory Council for Environmental Policy and Technology
Holland & Knight LLP
2100 Pennsylvania Avenue, NW
Suite 400
Washington, D.C. 20037-3202

Dear Mr. Rhodes:

On behalf of the Administrator, thank you for the recommendations from the National Advisory Council for Environmental Policy and Technology (NACEPT) pertaining to the Petroleum Refining Sector Workgroup's Refinery Air Information Reporting System (RAIRS) Project. Your recommendations regarding consolidated reporting -- both for air regulations and for multimedia reporting -- are very well received.

I believe that we need more progress toward more effective environmental reporting, not only to streamline reporting processes for regulated industries, but also to reorient reporting around accurate, transparent and meaningful performance measurements. The Environmental Protection Agency (EPA) is interested in helping create a reporting structure that is efficient for all involved, delivers more meaningful information, and aligns the information needs and interests of reporting facilities, communities, and regulators. My office is working with the Office of Environmental Information, other EPA offices, and EPA regional offices, to develop a path to improve environmental reporting, not only for the Petroleum Refining Sector, but for other sectors as well.

EPA has initiated several steps related to NACEPT's first recommendation to "allow the pilot refinery to report exclusively using the newly developed RAIRS method of reporting." EPA met with representatives from the NACEPT Petroleum Refining Sector Workgroup, the American Petroleum Institute, and the National Petrochemical and Refiners Association to discuss the feasibility of piloting the exclusive use of the RAIRS modified report at the Marathon Ashland Texas City refinery. At that meeting, we decided that Project XL was the best mechanism for such a pilot.

On May 11, 2001, the EPA and the Department of Justice announced a corporate-wide settlement agreement with Marathon Ashland Petroleum LLC that is expected to reduce air emissions from its seven petroleum refineries by more than 23,000 tons per year. As the Texas City pilot refinery is one of those refineries included in this agreement, the Agency must ensure that the RAIRS revised reporting requirements are consistent with the requirements of the consent decree prior to authorizing the implementation of the RAIRS recommendations on a pilot basis. After this analysis is completed, the Agency will determine how the XL project might best be implemented. The public will be afforded

an opportunity to participate in the development of the proposed XL project, just as the public had been involved throughout the development of the RAIRS Project.

The results of the RAIRS project demonstrated thus far are encouraging and provide a knowledge base for expanding the consolidated air reports to other refineries. Again, thank you for sharing NACEPT's recommendations and for working with EPA to help turn those recommendations into reality.

Sincerely,

Thomas J. Gibson
Associate Administrator