



June 5, 2001

Mr. Ron Methier, Chief
Air Protection Branch
Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

SUBJECT: Comments on Proposed Amendments to Air Quality Control Rules
391-3-1-.03(9) and the Air Fees Stakeholder Advisory Committee
Process

Dear Mr. Methier:

The Georgia Industry Environmental Coalition¹ (GIEC) appreciates this opportunity to submit comments to the Georgia Environmental Protection Division (EPD) on its proposed amendments to Air Quality Control Rule 391-3-1-.03(9). Much of what is expressed in this letter reflects support for the letter dated June 5, 2001, submitted by members of the Air Fees Stakeholder Advisory Committee (Committee).

As you know, GIEC has been a member of the Committee since it was convened by EPD's Air Protection Branch in the Summer of 2000. In addition to GIEC, members of this Committee include the Georgia Industry Association; the Georgia Mining Association; the Georgia Pulp and Paper Association; Georgia's Textiles, Carpet and Consumer Products Manufacturers Association and Georgia Power Company. Its mission is to provide assistance to the Air Protection Branch in developing an equitable fee system that will fully fund the Title V Program.

An immediate objective of the Committee was to assist EPD in identifying the means by which the Air Protection Branch could cover the FY2001 budgetary shortfall of over \$636,000 by April 30, 2001 and to develop a corresponding rule change for Board adoption by December 2000. This initial objective of the Committee and EPD was met.

The Committee proceeded to work with EPD's Air Protection Branch on development of the proposed amendments to the Air Quality Control Rules 391-3-1-.03(9), which are currently out for public comment. The proposed amendments drafted by EPD

¹ *GIEC is a not-for-profit membership organization of environmentally-regulated companies in Georgia. Its members form a diverse group of industries, representing over 30 companies and 20 SIC codes, with the shared belief that environmental regulations should, and can, be both protective and cost efficient. The mission of GIEC is to serve as a technically-based advocate for Georgia industry by promoting environmental regulations and policies founded on the protection of human health and the environment, sound science and cost/benefit principles. It is not GIEC's purpose to engage in political advocacy at either the state or national level.*

indicate significant progress towards development of Rules that fund the Title V Program and are fair and equitable.

However, this proposal falls short in addressing the following major concerns, which have been identified through the collaborative Committee/EPD process:

1. Several activities performed by EPD are not related to the Title V permitting program, yet are funded by Title V fees.
2. No provisions exist for incentives to reduce emissions.
3. Additional funding sources, such as the Georgia Legislature, were not utilized.
4. No progressive method is identified for future fee rate increases in the event more funding is needed.

We wish to take this opportunity to urge EPD to continue to work with the Committee to finish what we believe to be the beginning of a mutually-beneficial process. We hope to continue to more fully explore and implement several of the ideas exchanged over the past year in the areas identified above. In addition, we hope to continue to work with EPD on improving its current 'accounting system' (e.g., tracking revenue sources and expenses and prioritizing spending for new projects and equipment) to fully assess if sufficient funds have been collected from industrial sources utilizing EPD resources.

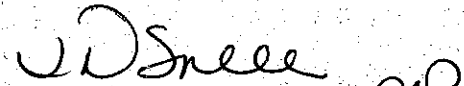
In closing, GIEC supports the currently proposed amendments to Air Quality Rules 391-3-1-.03(9) with the understanding that more work on issues like those identified above will continue so that resources for Georgia's Title V program are utilized in an effective and efficient manner.

Sincerely,

GEORGIA INDUSTRY ENVIRONMENTAL COALITION



Katie Kirkpatrick
Air Workgroup Chair



Terry D. Snell, P.E.
GIEC Chair

cc: H. Reheis
GIEC Membership