Winston H. Hickox
Secretary for Environmental Protection

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
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Gray Davis
Governor

March 10, 1999

Mr. Robert Perciasepe, Assistant Administrator
Office of Air and Radiation
United States Environmental Protection Agency
401 M Street
Washington, DC 20460

Dear Mr. Perciasepe:

Over the last several years, California state and local air pollution control agencies, environmental groups, and industry representatives have been working closely with the United States Environmental Protection Agency (U.S. EPA) to seek ways to integrate the federal air toxics program with California's air pollution control program. We appreciate the effort that the U.S. EPA has put forth in addressing this issue and are pleased to have the opportunity to comment on the proposed amendments to 40 Code of Federal Regulations (CFR), Part 63, Subpart E (Subpart E Amendments).

We believe that it is important to the future environmental and economic well-being of California to ensure that we find an acceptable resolution to this issue. The criteria for resolution must include the elimination of duplicate regulatory requirements, the efficient and effective use of limited resources, the retention of the environmental benefits of both the federal and California programs, and the ability for California to simply establish a more comprehensive and stringent criteria and toxic air pollution control program.

The proposed Subpart E amendments are an integral part of the policy and regulatory changes that must be implemented to successfully resolve this issue. As such, the signatories to this letter ask that you carefully consider the comments that you will be receiving from California regulatory, environmental, and industry representatives, and weigh the development of your final proposal against the criteria presented above. We are committed to continuing to work with the U.S. EPA and are optimistic that we can collectively resolve this issue.

Thank you for your consideration. If you have any questions, please contact Mike Kenny at (916) 445-4383.

Sincerely,

Michael P. Kenny
Executive Officer

Douglas W. Allard, President
California Air Pollution Control Officers Association

Mark Boese, Deputy APCO
San Joaquin Valley Unified APCD

Barry R. Wallerstein, D.Env., Executive Officer
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R.J. Sommerville, Director
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Manuel Cunha
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Michael D. Wang
Western States Petroleum Association

Cindy Tuck
California Council for Environmental and Economic Balance

Craig Anderson, Chairman
Air Committee
Industrial Environmental Association of San Diego

Jot Condie
California Manufacturers Association

cc: Air and Radiation Docket and Information Center (6102)
Attention Docket Number A-97-29
Room M-1500
United States Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Ms. Felicia Marcus, Administrator
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