

ORIGINAL: 2535

Hughes, Marjorie

From: Bossert, Terry [tbossert@postschell.com]
Sent: Wednesday, July 12, 2006 2:34 PM
To: RegComments@state.pa.us
Cc: jeeps@state.pa.us; rreiley@state.pa.us
Subject: Non-attainment New Source Review/ Proposed Regulations

Dear Chairperson McGinty:

I am sure you will receive many substantive comments regarding the Department's proposed regulations amending 25 Pa Code Chapters 121 and 127 relating to New Source Review. I would like to offer a rather simple formatting comment.

The proposed amendment move many definitions from section 121.1 to section 127.201a. New definitions are also added to 127.201a. Based on many years of experience dealing with the Department's regulations, I am of the view that it would be better to leave all the definition in section 121.1 and add the new definitions there as necessary. It is quite convenient and efficient to have all the definitions relating to the air programs in one location, rather than having to switch back and forth looking for definitions through out the the various chapters. While there may be special circumstances that warrant a separate definition section, I do not think the the NSR regulations present such a case. Additionally, having all the definitions in one place promotes consistency among all the air quality chapters.

I would urge the Board to maintain 121.1 as the repository of definitions and not create a sub-repository in 127.201a. Thank you for your consideration.

Terry R. Bossert
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
717-612-6018
tbossert@postschell.com

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