

Carol Browner  
Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

June 9, 1997

Ref: Problems with the issuance of the final Title V permit to Shintech and Its Affiliates, Inc.

Dear Ms. Browner,

Louisiana's Department of Environmental Quality (DEQ) has recently issued the final Title V permit to Shintech and Its Affiliates, Inc. This was done by the DEQ without adhering to state and federal laws requiring that each proposed permit must be submitted to the Environmental Protection Agency (EPA) for review. Issuing a final permit in this manner does not meet the requirements of the 1990 Clean Air Act (CAA) Section 505 and the Louisiana Administrative Code 33:III Chapter 5, Section 533. Both of these laws require an EPA 45 day review period followed by a 60 day public comment period for each permit proposed to be issued as a final permit. These very important steps, which are required by state and federal law, were skipped by the DEQ in issuing Shintech's Title V permit.

We consider Title V permitting to be extremely important to the people of Louisiana and to the future of Louisiana's environment. We ask that the EPA require the DEQ to adhere to all required aspects of the Clean Air Act, state delegation of the CAA, and Title V permitting. These are good environmental laws and must be strictly adhered to.

We specifically ask the Administrator of the Environmental Protection Agency to revoke the Title V permit issued to Shintech and Its Affiliates, Inc., on the grounds that it was not issued in accordance with state and federal laws; including Section 505 of the CAA and Chapter 5, Section 533 of the Louisiana Administrative Code 33:III.

Sincerely,

Marylee Orr  
Executive Director

cc: Al Gore, Vice President of the United States  
Lisa Lavie, Tulane Environmental Law Clinic

David Hawkin, NRDC