

I want to write and give you are sincere thanks for the chance to exchange information at the highest level of government in our great state. We would also like to take this opportunity to reiterate some of the issues and requests that came up in the December 3 meeting.

- We appreciate that DEQ has already granted a 30 day extension, but we need more time. There is an eighteen inch stack of information that must be thoroughly reviewed before we can comment on Shintech's permit application and on DEQ's draft permit. This might even be sufficient time if it weren't for the upcoming holidays. Because of the approaching holiday season and the amount of information that must be reviewed we are asking for an additional two week extension beyond January 9, 1997.
- We would again like to ask for a thorough review of the safety and evacuation issues that a facility like Shintech would raise. The best way to do this would be for you to ask the EPA for an Environmental Impact Statement.
- Shintech's air permit application isn't very good. DEQ has already issued their draft air permit that says Shintech's application is just fine and that Shintech can actually use less control than the application provides for. This is blatantly incorrect and not in accordance with state or federal law. Because of the 1990 Clean Air Act we now have a federal law and a state law that require Shintech use Maximum Achievable Control Technology (MACT). For a new plant MACT is defined as the best control technology currently used in the nation for a similar type of plant, and detailed MACT standards have been issued by the EPA. Instead of Shintech or DEQ requiring the best control technology in the nation, they both want to allow what will be some of the worst control technology in Louisiana.

DEQ is willing to allow Shintech to have a process vent that emits the most hazardous air pollution of any chemical plant or oil refinery in Louisiana. Shintech actually wants two of these process vents, which will emit 225,000 pounds of hazardous air pollution each. The largest process vent currently existing in a Louisiana chemical plant or refinery only emits 79,000 pounds of hazardous air pollution. This one is at DuPont and the DEQ has already stated that it will not be allowed under the Clean Air Act. But, DEQ say's that Shintech's two huge process vents are alright?

There are many other problems with the draft permit too. It must be stated that personnel in DEQ's Air Toxics group are some of the leading experts in MACT control standards in the nation. This group could easily and efficiently have settled Shintech's MACT problems, but apparently weren't allowed to. Instead, DEQ has chosen not to deal with the problems. There is no doubt that the EPA, who has oversight responsibilities under the Clean Air Act, will be ready and willing to address the problems. Shintech was there own worst enemy, and instead of helping expedite the process DEQ painted a giant bulls-eye on Shintech's rear end.

Again, I want to thank you on behalf of the St. James Citizen's for Jobs and the Environment for seeing us and for engaging us in a frank and meaningful exchange of ideas.