



PPRC Position Paper on EPA's New Source Review (NSR)/ Prevention of Significant Deterioration to the Environment (PSD) Permitting - Enforcement Initiative

The Wood Products Industry supports the EPA's new permitting approvals.

The PPRC strongly supports the current proposed rule changes to the New Source Review (NSR). (The rule changes including more clearly defined routine maintenance guidelines were proposed on June 13, 2002. They were finalized in the Federal Registry in December, 2002 and promulgated in September 2003.)

The Pulp & Paperworkers' Resource Council believes that these new rules will influence the Wood Products Industry in a very positive manner.

- The new rules make certain that only significant increases in emissions caused by changes trigger NSR. There are also tests for routine maintenance and replacement.
- The new changes to the NSR will not lower clean air standards, but they have been streamlined to eliminate red tape allowing companies to improve air quality.
- The new rules will unleash a backlog of energy efficient air reduction initiatives that have been stalled by problems with the previous NSR.
- Our air quality is protected by existing, pending and proposed future regulations.

The PPRC supports the enforcement of environmental laws that protect and enhance our environment as well as provide a safe and healthy life for all Americans. The PPRC position concerning New Source Review is not one that defends violators of environmental laws. If real violations are found, they should be enforced.

The PPRC believes that the new rule changes to the NSR allowing the paper industry to make changes and modifications and having clean air and more economically competitive will create jobs and help preserve the manufacturing base in the United States.

The PPRC is a grassroots organization representing the interests of the nation's pulp, paper, solid wood products, and other natural resource-based workers. The U.S. forest products industry is vitally important to our nation's economy, employing 1.5 million people. We rank among the top 10 manufacturers in 46 states with annual sales exceeding \$230 billion, which accounts for 7% of the U.S. manufacturing shipments. We are people dedicated to conserving the environment while taking into account the economic stability of the workforce and surrounding community.