

August 14, 2006

EPA Docket Center (EPA/DC)
Environmental Protection Agency
Mailcode 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2005-0475

Dear Sir or Madam:

The Northeast States for Coordinated Air Use Management (NESCAUM) appreciates the opportunity to comment on the proposed National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (HON), which were published in the *Federal Register* on June 14, 2006. Our comments focus on the risk-based exemptions in the proposed rule.

NESCAUM is a regional association that provides technical, policy and programmatic assistance on issues of regional concern to the air quality agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island and Vermont. Since the federal air toxics program was mandated by Congress in 1990, the NESCAUM Air Toxics and Public Health Committee has taken an active role in working with EPA and the regulated community to integrate the federal air toxics program with our existing state risk-based air toxic programs. Therefore, the Air Toxics and Public Health Committee possesses a broad range of expertise and practical experience on the use of public health risk assessment and risk management practices in the regulation of hazardous air pollutants.

EPA has requested comment on a "low-risk" alternative compliance approach that would allow a facility to demonstrate that the risks posed by HAP emissions from the HON-affected sources are below certain health effects thresholds. In March 2003, NESCAUM commented extensively on EPA's risk-based exemption scheme that was proposed in the Plywood and Composite Wood Product (PCWP) NESHAP. Since those comments address the same issues EPA is requesting comment on in the HON NESHAP proposal, we respectfully refer EPA to these comments in the "risk-based exemptions" subheading (page 2), which are attached.

Again, we appreciate your consideration of these comments. If you have any questions or would like to discuss our comments please contact the Air Toxics and Public Health Committee Coordinator, Heidi Hales of the Vermont DEC at 802 241-3848.

Sincerely,



Arthur N. Marin
Executive Director

Cc: NESCAUM Directors

Enclosures