

**From:** "John Maxwell" <*omitted*>  
**To:** <airworkshop@dep.state.nj.us>  
**Date:** Fri, Jul 7, 2006 4:39 PM  
**Subject:** 061606 Comments on NJDEP SIP Revision Plan White Papers

July 7, 2006

Dear Air Workshop Coordinators,

We are including by reference as our own the attached comments - carefully prepared by ConocoPhillips Bayway Refinery. We wholeheartedly endorse their observations and suggestions.

Of note, we applaud the DEP's efforts to include all stakeholders in the SIP discovery process - it should be a model for future rule development across all program elements.

We recognize, as the DEP has stated, that the white papers are not rule proposals, but are concepts that the DEP will consider in developing state policy to develop the next several federally mandated SIP proposals. As a matter of principle, we strongly urge the DEP to not deviate from federal regulatory requirements applicable to Title V facilities and minor-facilities.

To go beyond federal requirements will roil the region's fuel supply and fair market pricing.

We are concerned about additional emissions controls, alluded to in some of the white papers, at retail gasoline stations. These proposals need further vetting with stakeholders. There appears to be no real benefit but there are excessive costs associated with the concepts. Also, any attempt by this state to regulate home heating oil sulfur levels as mentioned in some of the white papers, without regional consensus and implementation, could pose a dire hardship upon those using home heating oil. This, too, needs further vetting among stakeholders.

Thank you for the opportunity to make comments on the white papers.

Sincerely,

John A. Maxwell  
Associate Director, New Jersey Petroleum Council

email: *omitted*