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### **MMA Comments on Proposed Administrative Rules – 2004-054 EQ - New Source Review**

The Michigan Manufacturers Association appreciates the opportunity to submit comments on the proposed Rules 2004-054EQ. These rules revise the definition of “replacement unit” and “net emissions” increase to comport with federal standards.

MMA is supportive of these proposed rule changes, because they adopt federal standards without adding additional state only burdens. By unifying Michigan’s program with federal law, the regulatory process is more predictable for the regulated community. Our members demonstrate a very high degree of compliance and frequently exceeding regulatory standards. By making the regulatory more predictable, regulatory planning costs and administrative expenditures necessary to achieve environmental protection standards are reduced.

Moreover, Michigan manufacturers compete not only with other states, but also in the global market place. Any changes to regulatory processes in Michigan that tend to align with federal processes, help keep a level playing field in terms of administrative and regulatory costs with competitor companies located in other states.

In addition, these rules help eliminate duplicative regulatory processes and empower the state to make regulatory decisions here in Michigan.

We appreciate being included in the workgroup process that helped develop these rules.

On timing, we hope that once finalized the rules could be moved quickly to the EPA to incorporate certain sections into Michigan’s SIP. We seek any opportunity and offer any assistance to the DEQ in encouraging the EPA to take swift action on Michigan’s SIP.

Again, thank you for the opportunity to express our support for these proposed rules.

Sincerely,

/S/

Michael Johnston  
Director of Regulatory Affairs