

Gray Valerie A. (DNREC)

From: Amirikian Ronald A. (DNREC)
Sent: Thursday, August 07, 2008 5:46 PM
To: Gray Valerie A. (DNREC); Cherry Philip J. (DNREC)
Subject: FW: comments for RGGI regulation "workshop"

fyi

-----Original Message-----

From: Alan Muller [mailto:amuller@dca.net]
Sent: Thursday, August 07, 2008 5:42 PM
To: Amirikian Ronald A. (DNREC)
Subject: comments for RGGI regulation "workshop"

Dear Ron:

I hope Green Delaware's views on this matter are no secret, but perhaps they bear repeating:

The question of whether to exempt the Valero refinery from participation in the RGGI program has been left to be determined in this Action (prejudicial statements of Secretary Hughes notwithstanding).

As we understand the RGGI Model Rule, Delaware may but is not required to exempt the refinery from participation.

Valero has stated a desire to be exempted, but has offered no sound public policy reason why the Delaware City Refinery should be exempted. Instead, Valero has offered unconvincing, and insulting threats.

Given the record profits rolling in to all segments of the oil industry, and the urgent need to act to reduce climate changing emissions, exempting Valero would, simply, be absurd.

The carbon dioxide emissions of the generating units at Valero represent on the order of 16 percent of such emissions from units subject to the RGGI program. This percentage has been increasing and is likely to increase more rapidly if the refinery units are exempted. Thus, exempting the refinery would establish a damaging loophole in the RGGI program.

The draft RGGI rule as developed by your section proposes an exemption for Valero. This we think, is a substantial and serious error in the draft regulation. This error should be corrected before the Department goes to public hearing.

I hope these comments will be presented at the "workshop." If they raise any questions please contact us.

Yours very truly,

am

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