

MERCK Comments.txt

From: Earley, Amy E. [amy_earley@merck.com]
Sent: Tuesday, May 30, 2006 3:03 PM
To: 'jhavens@state.pa.us'
Cc: Waslin, Michael J; Caputo, Kenneth; Wittmer, Steve C
Subject: Ozone Transport Region Measures

Hi Wick-

Merck & Co., Inc. appreciates this opportunity to provide comments to the Department on the OTR measures under consideration by the OTC. Merck & Co., Inc. is a global research-driven pharmaceutical company. The West Point site manufactures vaccines and pharmaceuticals and also performs research to discover new vaccines and pharmaceuticals. As part of the manufacturing facility, Merck operates various sized boilers and turbines, which would potentially be subject to the control measures under consideration by the OTC.

Of particular concern about these control measures is the timing of implementation. The candidate measures indicate full implementation by January 2009. It is unlikely that companies with sources subject to add-on control measures would be able to meet this deadline. First, the Department would have to promulgate new regulations for specific source categories. Second, companies would have to identify available control measures for their specific sources, as well as bid, design and award a contract to a vendor to perform the installation. Additionally, a permit from the PADEP would need to be obtained prior to construction of the air pollution control device. Those steps are a huge undertaking, let alone completing them in less than two and a half years. If Pennsylvania were to adopt the OTR measures, careful consideration should be given to the implementation of these measures. Streamlined or "fast-tracked" permitting, general permits, or presumptive controls should be considered as part of the implementation. Another concern is the validity of the control cost data the OTR presented. We were unable to verify with our vendor the particular control costs associated with the candidate control measures for NOx control on ICI boilers. Our boiler vendor has been contacted for actual control costs and these values will be forwarded to you as they become available. As the Department determines their implementation approach for these control measures, Merck will continue to participate in the process as a member of the regulated community. If you have questions or would like to discuss these comments further, please contact me at 215-652-4247. Sincerely,

Amy Earley
Environmental Engineering
WP20-208
215-652-4247

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