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BY ELECTRONIC AND U.S. MAIL

Karen G. Sabasteanski
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218

RE: Regulation for Emissions Trading Programs

Dear Ms. Sabasteanski:

AdvanSix is a major employer in Virginia. Its sites in Virginia employ several hundred employees.

AdvanSix opposes DEQ adoption of the proposed rule entitled "Regulation for Emissions Trading Programs" (9 VAC 5-140-6010 through 9 VAC 5-140-6430).

Among the more significant concerns AdvanSix has with this proposed rule are the following. First, the proposed regulations are more stringent than federally required. Virginia's historical approach has been to adopt only rules as stringent as those required by federal law. Second, the rule would unnecessarily impose substantial increased electricity costs for all electricity consumers (industrial and commercial, as well as residential).

Should DEQ nevertheless adopt this rule, we strongly support retention of the exclusion for industrial facilities included in the proposed rule.

AdvanSix also strongly supports VMA's comments on this proposed regulation.

Sincerely,

Mike Stoneberger
HSE Leader