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Metropolitan Washington Air Quality Committee

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* * * DRAFT MWAQC COMMENT LETTER * * *

July 23, 2008

Richard D. Langford, Chair
Virginia State Air Pollution Control Board
c/o Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218

Dear Chair Langford,

I am writing on behalf of the Metropolitan Washington Air Quality Committee (MWAQC) regarding Virginia's opacity regulations, Section 9 VAC 5-40-80 and 9 VAC 5-50-80 (Standard for Visible Emissions). MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop regional air pollution control strategies for the Washington, DC-MD-VA region. The region is designated as a nonattainment area for the 1997 8-hour ozone and 1997 annual PM_{2.5} NAAQS. Virginia jurisdictions represented on MWAQC include Arlington, Fairfax, Loudoun, and Prince William counties and the Cities of Falls Church, Manassas, Alexandria, and Fairfax. The Metropolitan Washington Air Quality Committee (MWAQC) was created to ensure a regional approach to improving air quality. In its effort to further improve the region's air quality with respect to fine particulate emissions, MWAQC recently chose to submit to the EPA a PM_{2.5} SIP rather than a request to rescind the region's non-attainment designation.

MWAQC is concerned that the opacity standards for new and existing facilities in Virginia are set at a level that is too high to be sufficiently protective of human health. On March 7, 2008, MWAQC adopted a resolution to petition the Air Board to revise the opacity standard. The District of Columbia and Maryland have much stricter opacity standards (0-10%) for emissions from point sources in the Metropolitan Washington D.C. non-attainment area. In contrast, Virginia's opacity standard at 20%, is the least stringent of the three jurisdictions. MWAQC requests that the Air Board lower the Virginia opacity standard from 20% to 10%, at least in the Northern Virginia region, to be more consistent with those of the above two jurisdictions. Such a measure agrees with EPA's Clean Air Fine Particulate Implementation Rule, which recognizes the revision of the opacity standard as a legitimate and reasonable control measure for PM_{2.5}.

MWAQC believes that such action by the Board could help to improve air quality in the metropolitan Washington D.C. area. We strongly urge the State Air Pollution Control Board to lower the opacity standard for new and existing facilities from 20% to 10%.

Sincerely,

Dave Snyder, Chair
Metropolitan Washington Air Quality Committee