

DRAFT

Metropolitan Washington Air Quality Committee

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May 23, 2007

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 implementation of Virginia's CAIR regulations as approved by the Virginia State Air Pollution Control Board. 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. Virginia jurisdictions represented on MWAQC include Arlington, Fairfax, Loudoun, and Prince William counties and the Cities of Falls Church, Alexandria, and Fairfax. MWAQC members support the Virginia CAIR provisions (9 VAC 5-140) that prohibit trading of emissions allowances by electric generating units in nonattainment areas.

MWAQC and the states have approved an air quality plan ("SIP") to meet the National Ambient Air Quality Standard for ozone. The SIP contains provisions for significant reductions from the electric generating facilities located in the region. The VA CAIR rule contains provisions that do not allow trading of NO_x and SO₂ within the nonattainment areas, thereby requiring facilities within the nonattainment area to reduce their emissions. The MD Healthy Air Act (HAA) sets strict caps on coal fired power plants and also restricts trading. Photochemical modeling in the SIP shows that the NO_x emission reductions associated with the ban on emissions trading are needed to bring the Washington, DC-MD-VA region into attainment of the ozone standard.

The NO_x reductions from the Virginia CAIR regulation with its no trading provision are a critical part of the region's attainment plan. We strongly urge the State Air Pollution Control Board to keep the no trading provisions in the Virginia CAIR regulation.

Sincerely,

Nancy Floreen, Chair
Metropolitan Washington Air Quality Committee