



Metropolitan Washington
Council of Governments

April 10, 2019

Acting Administrator Andrew Wheeler
U.S. Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2018-0794
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Subject: Comment on the Proposed Rule to Revise Supplemental Cost Finding for MATS; Docket ID No. EPA-HQ-OAR-2018-0794

Dear Acting Administrator Wheeler:

Thank you for providing an opportunity to comment on proposed rule to revise the supplemental cost finding for Mercury & Air Toxics Standards (MATS).

The Metropolitan Washington Air Quality Committee (MWAQC) is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop plans demonstrating attainment of federal ozone and other criteria pollutant standards for the Washington, DC-MD-VA non-attainment area. We have done so successfully for more than twenty-five years through a partnership among the state and local governments in metropolitan Washington.

MWAQC is concerned with the proposed action. EPA's proposal to revise its supplemental cost finding analysis for MATS does not include the fine particulate (PM_{2.5}) co-benefits resulting from the control of Mercury and other Hazardous Air Pollutants (HAPs) from coal- and oil-fired electric generating units. This is the first time EPA has chosen to exclude the co-benefits of reductions in other harmful pollutants while reviewing a standard for any pollutant. This choice also goes against basic accounting principles including those found in Office of Management and Budget's (OMB's) own procedures. MWAQC is concerned that this process could be used again in the future for reviewing criteria pollutants, such as ozone. Existing regulatory procedures, practices, and policies in this regard have worked well in the past and there is no reason to change them.

The Washington region has been able to make significant progress in improving its air quality as a result of a number of federal, state, and local rules that were adopted over the years. Those federal rules and standards were developed based on the existing procedure of including co-benefits in the cost finding determination. Any changes to that procedure, such as this, will adversely affect the process of the review of future rules and standards and will not be protective of the health of citizens in this region.

Thank you again for the opportunity to provide comments on the proposal to revise the supplemental cost finding for MATS.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David F. Snyder'.

The Honorable David F. Snyder
Chair, Metropolitan Washington Air Quality Committee (MWAQC)