

Air Quality Public Advisory Committee

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The Air Quality Public Advisory Committee (AQPAC) is an advisory body to the Metropolitan Washington Air Quality Committee (MWAQC).

February 6, 2008

Dear MWAQC:

This letter is the response of the Air Quality Public Advisory Committee (AQPAC) to your solicitation for comments on the draft *State Implementation Plan (SIP) for Annual Fine Particle (PM_{2.5}) Standard and 2002 Base Year Inventory for the Washington DC-MD-VA Nonattainment Area*, issued December 12, 2007.

First, we commend the States and the Metropolitan Washington Council of Governments for their considerable efforts to reduce particle pollution below the annual standard. We also approve of the preparation of this SIP even though the region is now in attainment, as a sign of the commitment of the region to continuous improvement. We note that regional controls required by Clean Air Interstate Rule, Maryland's Healthy Air Act, and other recent Federal and State actions will help the region remain in compliance with the current standard and begin to make progress against future lower standards.

We also laud the fact that control measures include interesting supplemental measures such as green buildings, light-emitting diodes, and building energy efficiency. Alternative and non-air-polluting energy sources should be promoted by measures like these, in dialogue with the public.

However, we have some concerns and additions as articulated below.

- Direct primary PM_{2.5} emissions, while not a large part of the inventory, are increasing and may need to be addressed in the future.
- While Section 2.2 (Health and Environmental Effects) describes the problems that PM_{2.5} causes, outside of this section the SIP does not mention or imply that the reductions, contingencies, or controls will reduce the health or environmental effects of PM_{2.5}. The fact that health improvements are expected under the actions described in this SIP should be better described.¹
- In Section 2.6, the OCMs² and the sulfates as mentioned and depicted are of greater concern if considered cumulatively. Yet there is no dialogue regarding them, and in this same section the primary aerosols, given the capacity to create new PM, should be clearly explained.
- The location of several large particle pollution sources in the region, specifically power plants, continues to raise some concern.

¹ AQPAC notes that NAAQS promulgation entails an accounting of such improvements.

² The term OCM should be included in the glossary.

- The SIP does not address the potential impact on fine particle emissions of some of the reduction measures, such as additives to coal fired power plants, e.g. TRONA added to coal-fired power plants as causing or not causing additional PM_{2.5}. For this SIP, TRONA and other additives need to be discussed, specifically addressing whether they cause increases in power-plant PM_{2.5} emissions.
- According to Section 9.4.4, current PM_{2.5} monitors at the PRGS site do not meet EPA siting criteria and thus could not be used. Given that this source is a serious polluter by EPA's lights, PM_{2.5} monitors that do meet EPA siting criteria need to be added or the current monitors corrected so as to be utilized to measure PM_{2.5} in accordance with those criteria. And other locations considered sources of PM_{2.5} should also have monitors that comply with the criteria.
- Section 9.4.5 dubs .5 percent a "margin of safety." The SIP should clearly explain this percentage and justify its adequacy as a margin, since it may not be adequate.

Both proactive and prescriptive measures to reduce fine particle pollution are of significant interest to the public and we encourage their development and implementation. Pushing forward on these initiatives now, especially since some require medium- to long-term planning, is essential in light of the reduction of the daily standard to 35 µg/m³. Education of the public on the health related issues of fine particles should also be intensified, since it will facilitate future voluntary or regulatory reductions for both fine particles as well as expected requirements to reduce other pollutants with similar sources, such as greenhouse gases.

In closing, we strongly encourage the States and the District address the concerns of AQPAC and other stakeholders, and then implement this SIP and many other initiatives beyond this SIP expeditiously in order to reduce fine particle pollution significantly enough to meet the standard with a significant margin of safety (preferably much greater than 0.5). This will help both to ensure current and future compliance, and to maximize improvement of the health of the residents of the region.

Thank you for your consideration of these comments. Please contact us if you have any questions concerning the AQPAC input to the annual PM_{2.5} SIP.

Sincerely,

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AQPAC Chair

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AQPAC Vice-Chair

cc: AQPAC members
Joan Rohlf, COG