

Metropolitan Washington Air Quality Committee

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March 25, 2004

United States Environmental Protection Agency
EPA Docket Center (EPA/DC)
Air and Radiation Docket and Information Center, 6102T
1200 Pennsylvania Ave, NW
Washington, DC 20460
Attention: Docket ID No. OAR-2003-0053

RE: Proposed Interstate Air Quality Rule

Dear Administrator Leavitt,

I am writing to you on behalf of the Metropolitan Washington Air Quality Committee (MWAQC) in response to EPA's request for comments on the proposed Interstate Air Quality (IAQ) Rule. Addressing transported pollution is the single most important issue for Metropolitan Washington's air quality planning. MWAQC strongly supports additional controls on transported air pollution. The proposed IAQ Rule is only a first step towards implementing additional controls. However, the proposed rule falls short of the reductions needed to address the transport of pollutants by the attainment date specified in the Clean Air Act in two respects. First, it delivers benefits too late to assist many eight-hour non-attainment areas. The first phase of reductions does not occur until 2010, the attainment year for moderate areas, while the second phase occurs in 2015, two years after serious areas are required to attain. Secondly, the caps are too high to help the Washington region meet its attainment goal. MWAQC strongly urges EPA to adopt a rule that requires more stringent emission caps implemented sooner than under the draft IAQ proposal.

MWAQC believes a transport rule similar to that advanced by the Ozone Transport Commission (OTC) is necessary to enable the Washington region to attain the eight-hour ozone standard.¹ In contrast to the current IAQ proposal, the OTC proposal would achieve emission levels that are consistent with attainment of the 8-hour standard.² The reductions would also be achieved substantially earlier. MWAQC advocates implementing step-down emission caps at least two years before the attainment dates for moderate and serious areas in order to assist these areas in achieving the 8-hour standard by the statutory deadline.

MWAQC is the Clean Air Act Section 174 entity certified to prepare regional air quality plans for the Washington DC-MD-VA non-attainment area. Its membership includes local elected officials from throughout the region, state air and transportation agencies, and state legislature representatives (see enclosed membership roster).

The Washington area is currently designated non-attainment for the federal 1-hour ozone standard and expects to be designated non-attainment for the 8-hour standard later this year. As indicated in the one-hour attainment demonstration incorporated in the region's recent SIP revision³, a significant portion of the region's total monitored ozone enters the region through transport. Despite our efforts to reduce

emissions locally, University of Maryland researchers tell us that pollution from the Ohio River Valley is almost always present in the upper atmosphere in the summer.⁴ This pollution from outside the region is mixed down into the air around us, contributing 50-70 percent of the problem in this region on the worst days of summer. EPA staff has advised the state air agencies of Maryland, Virginia and the District of Columbia that the Washington region can expect to be designated a serious or severe non-attainment area for the eight-hour standard.

MWAQC is committed to developing additional local and regional control measures for use in meeting the eight-hour standard. However, identifying reasonable, cost effective local control measures is increasingly difficult. The Washington region's controls on stationary and area sources are among the most restrictive in the nation. Continued reductions in transported emissions from all source sectors – stationary, mobile, area and non-road – will be a critical element of the region's effort to attain this new standard.

The final emission caps contained in the proposed IAQ Rule do not occur until 2015, two years after the proposed attainment date for serious areas. Additionally, EPA modeling projects that the 2015 caps would be insufficient to enable many areas, including the Washington region, to attain the eight-hour standard.⁵ MWAQC asks EPA to adopt more stringent controls that would enable the Washington region to attain the eight-hour standard, and that would address fine particulates, which is another concern in protecting the health of our residents. Lastly, we urge EPA to include in the regulation provisions for renewable energy, wind energy and other approaches that reduce ozone transport by displacing fossil fuel emissions..

The staff of MWAQC and the state air agencies of Maryland, Virginia and the District of Columbia wish to work closely with EPA on the critical goal of achieving clean air for the Washington region. We ask you to consider our comments in your review of the proposed Interstate Air Quality Rule.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Dernoga', with a long, sweeping horizontal line extending to the right.

Thomas Dernoga, Chair

¹ See Ozone Transport Commission, "Testimony on EPA's Interstate Air Quality Rule", February 25, 2004 and OTC Multipollutant Platform adopted on January 27, 2004.

² U.S. EPA, "Discussion of Multi-Pollutant Strategy", September 18, 2001.

³ "State Implementation Plan (SIP) Demonstrating Rate of Progress for 2002 and 2005; Revision to 1990 Base Year Emissions; and Severe Area Attainment Demonstration for the Washington DC-MD-VA Nonattainment Area", February 19, 2004.

⁴ Pollutant Transport During a Regional O3 Episode in the Mid-Atlantic States, W. F. Ryan, B. G. Doddridge, R. R. Dickerson, K. Hallock, P. T. Roberts, D. L. Blumenthal, J. A. Anderson, and K. L. Civerolo, J. Air Waste Manag. Assoc., 48, 786-797, 1998.

⁵ Technical Support Document for the Interstate Air Quality Rule, Air Quality Modeling Analysis, p. 64.