



May 25, 2022

Administrator Michael S. Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Support for the proposed Federal Implementation Plan (FIP) to cut air pollution across the United States

Dear Administrator Regan:

On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), we are writing to offer our support for efforts taken by the U.S. Environmental Protection Agency (EPA) to assure that the 26 states identified in the proposed Federal Implementation Plan (FIP) do not significantly contribute to problems attaining and maintaining the 2015 Ozone National Ambient Air Quality Standards (NAAQS) in downwind states. MWAQC is the air quality planning commission for the National Capital Region certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop plans to attain federal standards for air quality and improve air quality. Efforts to lower the transport of upwind emissions align with our 2021 Legislative Priorities to support policies that preserve and protect regional air quality and public health.

Upwind transport is an important issue to address, as poor air quality affects the residents living and working in metropolitan Washington. The region is currently designated as being in nonattainment of the federal 2015 ozone national ambient air quality standard (NAAQS). While significant progress has been made in metropolitan Washington to reduce air pollutant emissions locally, addressing emissions that are transported into the region from upwind states is critical to continuing to deliver cleaner air for the region's residents. As such, MWAQC believes that the nitrogen oxides emissions limitations applicable to certain industrial stationary sources in 23 states being proposed in this FIP are appropriate and necessary to meet requirements established in the Clean Air Act's "good neighbor provision" that prohibits any source of emissions activity in one state from emitting pollutants in amounts that contribute to nonattainment or interfere with maintenance of the NAAQS in neighboring states.

MWAQC is committed to developing additional local and regional control measures for use in meeting the 2015 ozone NAAQS. However, identifying reasonable, cost-effective local control measures is increasingly difficult. The metropolitan Washington region has already enforced significant controls on local emissions sources. Continued reductions in transported emissions from upwind states will be a critical element of the region's effort to attain the ozone NAAQS. Therefore, MWAQC believes that this effort made by EPA to eliminate significant contribution to nonattainment, or interference with maintenance, of the 2015 ozone NAAQS in the metropolitan Washington region would significantly impact our ability to realize the emissions reductions needed to comply with current and future ozone NAAQS and improve public health in the region. Additionally, some of our member jurisdictions have submitted comments in support of EPA efforts to curb upwind transport.

Thank you again for the opportunity to provide comments on the EPA's proposed Federal

Administrator Michael S. Regan
February 18, 2022

Implementation Plan (FIP) to cut air pollution across the United States.

Sincerely,

Takis Karantonis
Chair, Metropolitan Washington Air Quality Committee (MWAQC)