



January 27, 2016

Attention: Docket ID No. EPA-HQ-OAR-2015-0500

Administrator Regina McCarthy  
Environmental Protection Agency  
EPA Docket Center (EPA/DC), Mailcode 28221T  
1200 Pennsylvania Avenue, NW.  
Washington, DC 20460

Re: Proposed Updates to the Cross-State Air Pollution Rule

Dear Administrator McCarthy:

On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), I am writing to comment on the proposed update to the Cross-State Air Pollution Control Rule. MWAQC was designated in 1992 under Section 174 of the Clean Air Act (CAA), to develop regional air quality plans for attaining Federal air quality standards in the Washington region. We have done so successfully over the past twenty four years. This assignment is carried out through a partnership among the States of Maryland and Virginia and the District of Columbia, and the region's local governments in the non-attainment area.

MWAQC supports the proposed update to the US Environmental Protection Agency's (US EPA) Cross-State Air Pollution Control Rule. Starting in 2017, the proposed updated rule will reduce summer time emission of oxides of nitrogen (NO<sub>x</sub>) by over 30% compared to 2014 from power plants in 23 states in the eastern half of the U.S., providing significant health benefits to people in the Washington region. The proposal would result in public health benefits by preventing harmful and costly health effects, such as, asthma attacks, missed work and school days, hospital and emergency room visits, and premature deaths. The proposal would also result in climate-related co-benefits besides providing an improvement in the visibility in national and state parks, and an increase in protection for sensitive ecosystems such as, lakes, streams, coastal waters, estuaries, and forests.

The Cross-State Air Pollution Control Rule will be very helpful in controlling air pollution at its source. The rule would further reduce air quality impacts of the interstate transport of air pollution on downwind areas such as, the Washington region. The rule will help the region maintain its compliance in the future with the current ozone and fine particle standards.

MWAQC urges EPA to consider within the final rule its effect on 2016 summertime NO<sub>x</sub> emissions. Preliminary air quality data for the Metropolitan Washington DC area shows this region to be attaining the 2015 ozone NAAQS, with a design value of 0.070 ppm. Therefore, the air quality in 2016 is important both for the health of our citizens and in future 2015 ozone NAAQS designations, which impact transportation planning and economic activities.

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MWAQC applauds your efforts to control air pollution coming out of power plants, which are one of the most significant contributors of precursors of ozone and fine particles. MWAQC notes that this proposal is considered a partial remedy to the problem of interstate transport. MWAQC encourages EPA in future rules addressing subsequent NAAQS to examine all source sectors for least cost alternatives to the problem of interstate transport.

Thank you again for your leadership on this important issue. We look forward to the improvements in air quality as a result of this important action.

Sincerely,

The Honorable Brianne Nadeau  
Chair, Metropolitan Washington Air Quality Committee (MWAQC)