

Metropolitan Washington Air Quality Committee

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September 23, 2009

United States Environmental Protection Agency
EPA Docket Center (EPA/DC), Mailcode 2822T
Attention Docket ID No. EPA-HQ-OAR-2005-0161
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Docket ID No. EPA-HQ-OAR-2005-0161

To: U.S. Environmental Protection Agency

I am writing on behalf of the Metropolitan Washington Air Quality Committee (MWAQC) regarding EPA's Proposed Renewable Fuel Standard proposed on May 26, 2009. MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop regional air pollution control strategies for the Washington, DC-MD-VA region.

While the proposed RFS helps address issues of national concern in enhancing energy security and reducing greenhouse gas emissions, we are also concerned about the potential impact of the proposed rule on regional ground level ozone and particulate matter levels. Therefore, should the rule be implemented as proposed, we urge EPA to mitigate these potential impacts and adopt appropriate, timely and cost-effective emission controls that can be implemented on a national and regional scale.

As you're aware, EPA has recently lowered the National Ambient Air Quality Standard (NAAQS) for ozone and is currently proposing revisions to the NAAQS for NO₂. Attaining the new lower ozone standards will be challenging, air quality monitoring data suggest that polluted air transported into our region is often already at levels that exceed the proposed new standard. As EPA indicates in the proposed rule, emissions of the ozone precursor NO_x are expected to increase as a result of the proposed biofuels mandate, however, EPA did not provide any results from air quality modeling studies that would enable the region to better understand the likely air quality impacts as it develops plans to meet the new standard.

We believe a comprehensive federal analysis of anticipated air quality impacts is therefore essential before finalizing the proposal. To meet the new lower NAAQS, MWAQC needs the full cooperation and support of the federal government to address sources of emissions that are outside the control of state and local governments. To this end, EPA should initiate strong proactive steps to mitigate the anticipated increase in emissions through other regulatory initiatives.

Sincerely,

Phil Mendelson, Chair
Metropolitan Washington Air Quality Committee