

April 19, 2011

Mr. Christian Fellner  
Energy Strategies Group, Sector Policies and Program Division  
EPA Docket Center (EPA/DC)  
Environmental Protection Agency, Mailcode: 2822T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460  
Docket ID. EPA-HQ-OAR-2011-0044

RE: Proposed Rule on New Source Performance Standards  
(Docket ID No. EPA-HQ-OAR-2011-0044)

Dear Mr. Fellner:

I am writing with recommendations from the Houston-Galveston Area Council (H-GAC) to endorse the proposed rule to revise the new source performance standards (NSPS) on electric utility steam generating units (EGU). H-GAC's Board of Directors approved these recommendations prepared by its Regional Air Quality Planning Committee.

The proposed rule will require that all coal and oil-fired EGUs reflect the application of the maximum achievable control technology (MACT). The proposed rule will also require coal-fired power plants to install modern pollution control equipment that reduce hazardous air pollutants (HAPs), nitrogen oxides (NO<sub>x</sub>), particulate matter, and sulfur dioxide.

In particular, H-GAC agrees with the proposed rule for the following reasons:

- The proposed rule will help reduce the emissions of HAPs, pollution that is linked to adverse health effects such as cancer, birth defects, heart attacks, strokes, and even death;
- Plant owners may continue to profitably use the domestic fuel source of coal by adopting a variety of pollution control strategies and technologies that provide the greatest protection to public health;
- Most MACT is commercially available and is currently being used in new coal-fired plants;
- The proposed rule to lower HAPs may help the Houston-Galveston-Brazoria ozone nonattainment area as HAPs are ozone precursors; and,
- Existing and new facilities implementing the NSPS would minimize impacts that detract from the ongoing efforts and investments the region has made to improve air quality.

H-GAC recognizes that the application of the MACT standard is based upon the pollution reductions observed by several coal-fired power plants that are currently implementing a variety of pollution control strategies and technologies that meet the MACT standard.

It is crucial that our local governments, industry, state, and nation continue to protect public health by taking appropriate steps to allow the area improve air quality. We also need to ensure our region's economic future and preserve our investments for cleaner air. H-GAC is committed to this shared effort and looks forward to working with EPA to accomplish these important goals.

Sincerely,

Jack Steele

JS/jbf