

June 3, 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

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

Dear Mr. Fellner:

I am writing with comments of the Houston-Galveston Area Council (H-GAC) on EPA's proposal to strengthen regulatory standards for hazardous air pollutants emitted by coal-fired electric power plants. H-GAC is the voluntary association of local governments for the thirteen county Houston metropolitan region and serves as Metropolitan Planning Organization for the Houston-Galveston-Brazoria (HGB) non-attainment area.

H-GAC supports the EPA proposal to revise the new source performance standards for fossil fuel-fired electric utility steam generating units (EGUs) and to create a maximum achievable control technology (MACT) standard applicable to coal-fired and oil-fired EGUs. H-GAC's Board of Directors approved these comments recommended by its Regional Air Quality Planning Committee, an advisory committee comprising members from business and industry; citizen and environmental organizations; and local governments from the non-attainment area.

The proposal requires that all subject coal- and oil-fired EGUs install MACT to reduce the emissions of listed hazardous air pollutants. The proposal also requires that new or modified coal-fired and oil-fired power plants install modern pollution control equipment that reduces the emissions of particulate matter and sulfur dioxide. In addition, the proposal provides flexibility to plant owners and is based upon technology that is commercially available.

The proposed MACT rule will help reduce emissions of hazardous air pollutants, which are linked to adverse health effects such as cancer, birth defects, heart attacks, strokes, and even death. This rulemaking supports ongoing efforts and investments the region has made to improve air quality.

It is crucial that our local governments, industry, state, and nation continue to protect public health by taking appropriate steps to help regions improve air quality. 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