

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:

The Houston-Galveston Area Council (H-GAC) is the region-wide voluntary association of local governments in the 13-county Gulf Coast Planning Region. It acts as the Council of Governments and the Metropolitan Planning Organization for the Houston-Galveston-Brazoria (HGB) area. I am writing with recommendations from H-GAC to endorse the EPA proposal to revise the new source performance standards on 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 recommendations prepared by its Regional Air Quality Planning Committee, an H-GAC advisory committee comprised of HGB members from three sectors: Business and Industry; Citizen and Environmental Organizations; and Local Governments.

The proposal will require that all subject coal and oil-fired EGUs install MACT controls to reduce the emissions of listed hazardous air pollutants (HAPs). The proposal also requires that new or modified coal-fired and oil-fired power plants to install modern pollution control equipment that reduces the emissions of nitrogen oxides (NO_x), particulate matter, and sulfur dioxide.

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

- The proposed MACT 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;
- Most MACT is commercially available and is currently being used in new coal-fired plants;
- H-GAC is familiar with the implementation of MACT standards on oil-fired and coal-fired power plants;
- The proposed rule to lower HAPs may also help the HGB area with ozone attainment, as many of the MACT being used also helps to reduce NO_x an ozone precursor; and,
- This rulemaking will help our ongoing efforts and investments the region has made to

Comment [jbf1]: Date to be Changed

Deleted: the Houston-Galveston Area Council (H-GAC)

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Deleted: hazardous air pollutants (HAPs),

Deleted: <#>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.¶

Deleted: and acknowledge that they aid to eliminate ozone precursor pollutants

Comment [jbf2]: ~ From Steve Hansen~ the MACT rule identifies specifically listed HAPs for this source type that will be reduced – these listed HAPs are NOT ozone precursors }

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improve air quality.

H-GAC has previously submitted a comment alerting the Texas Commission on Environmental Quality of our concerns with migrating air emissions from outside the HGB nonattainment area. H-GAC believes that this commit remains consistant with our stance in protecting the investments and effort we have made in reaching attainment.

It is crucial that our local governments, industry, state, and nation continue to protect public health by taking appropriate steps to allow the area to 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

Deleted: 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.¶

Deleted: We also need to ensure our region's economic future and preserve our investments for cleaner air.