



COMMONWEALTH of VIRGINIA

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April 6, 2017

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
Docket ID No. EPA-HQ-OAR-2016-0751
Mail Code 2821T
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Comments on the Environmental Protection Agency's Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard (NAAQS) (82 FR 1733, January 6, 2017), Docket ID No. EPA-HQ-OAR-2016-0751

The Virginia Department of Environmental Quality (DEQ) is pleased to offer comments on the U.S. Environmental Protection Agency's (EPA's) notice of data availability for the preliminary modeling performed to support interstate transport requirements under the Clean Air Act (CAA) for the 2015 Ozone National Ambient Air Quality Standard (NAAQS).

DEQ encourages EPA to consider the comments and observations in the enclosed document as work continues to finalize the analyses supporting the transport rule's development. Many of the enclosed comments deal with inventory development for 2023. As such, DEQ recommends that EPA update emissions from the sectors discussed in the enclosure and perform additional air quality modeling, taking into account these recommendations. Proceeding in this manner will ensure that sound science as well as up to date information are the basis for the future rule addressing interstate transport of ozone and its precursors.

Additionally, DEQ notes that EPA considered the Cross State Air Pollution Rule Update (81 FR 74504) to be a partial remedy supporting the 2008 ozone NAAQS for interstate transport. DEQ encourages EPA in future transport rules addressing the 2015 ozone

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NAAQS as well as subsequent NAAQS to examine all source sectors for effective, least cost alternatives to the problem of interstate transport. EPA should ensure any future regulation is a full remedy to interstate transport requirements for the 2015 ozone NAAQS.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas R. Ballou", with a long horizontal flourish extending to the right.

Thomas R. Ballou
Director, Air Data Analysis and Planning
Air Division

TRB\dam
Enclosure