



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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October 15, 2007

Dave Campbell, Chief  
Permits and Technical Assessment Branch  
Mail Code 3AP11  
U.S. EPA, Region 3  
1650 Arch Street  
Philadelphia, PA 19103

Dear Mr. Campbell:

The following are comments of the Regional Air Pollution Control Agency (RAPCA) of Dayton, Ohio on the U.S. Environmental Protection Agency's (EPA's) proposal to approve the State Plan submitted by the Commonwealth of Pennsylvania which address the requirements of EPA's Clean Air Mercury Rule (CAMR). This proposal was published in *Federal Register* on September 13, 2007 (72 *Federal Register* 52325). RAPCA is a six-county local air pollution control agency serving the citizens of the Southwest Ohio counties of Clark, Darke, Greene, Miami, Montgomery, and Preble.

RAPCA offers its support for the Pennsylvania State Plan. The plan sets Pennsylvania specific mercury emission limits for coal-fired EGUs within the state, does not allow trading of emissions allowances outside the state, and includes monitoring, recordkeeping, reporting, and other provisions. We feel such a program provides the site specific controls of mercury, a known neurotoxin, as was intended by Congress when it established the toxics program under section 112 of the Clean Air Act. The plan will establish real reductions in mercury emissions, with the benefits of those reductions realized nearby.

We are encouraged by Pennsylvania's adoption of this plan, and fully support U.S. EPA's proposal to approve it.

Thank you for this opportunity to comment. If you have any questions, please contact this writer at (937)225-5948.

Sincerely,

John A. Paul  
Administrator