



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery, and Preble Counties
117 South Main Street, Dayton, OH 45422-1280
937.225.4435 — FAX: 937.225.3486
www.rapca.org

June 23, 2009

Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail code 6102T
Attention Docket ID No. EPA-HQ-OAR-2009-0171
1200 Pennsylvania Ave., NW
Washington, DC 20460

Dear Sir or Madam:

On behalf of the Regional Air Pollution Control Agency, I appreciate this opportunity to comment on the U.S. Environmental Protection Agency's (EPA's) Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, as published in the *Federal Register* on April 24, 2009 (74 *Federal Register* 18886). EPA is proposing to find under section 202(a) of the Clean Air Act that (1) greenhouse gases (GHGs) endanger public health and welfare and (2) the combined emissions of four specific GHGs from new motor vehicles and new motor vehicle engines are contributing to this mix of GHGs in the atmosphere and therefore contribute to the air pollution that is endangering public health and welfare. RAPCA personnel support these proposed findings.

We believe there is ample documentation of the scientific link between greenhouse gases and global warming, and that both public health and welfare are endangered. Furthermore, we believe that emissions of these greenhouse gases from mobile sources contribute to levels in the atmosphere that may be anticipated to endanger public health and welfare.

Whereas RAPCA personnel prefer legislation to define precisely how greenhouse gases should be regulated, we also believe there are several opportunities for effective regulation under the existing Clean Air Act (mobile source controls, New Source Performance Standards, BACT for PSD sources). We also believe there is sufficient flexibility under the Act to avoid some of the unintended consequences of regulation under the Act that are being discussed in the media. Thus, we support EPA's proposed findings and stand ready to work with personnel from EPA and other state and local agencies on the implementation of subsequent control measures under the Act.

Thank you for this opportunity to comment. Please contact this writer with any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "John A. Paul". The signature is written in a cursive style with a large, prominent "J" and "P".

John A. Paul, RAPCA Administrator