



June 29, 2020

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U. S. EPA Docket Center (EPA/DC)
U.S. Environmental Protection Agency
Mail Code: 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: DOCKET ID No.EPA-HQ-OAR-2015-0072

Re: Proposed Rule “Review of the National Ambient Air Quality Standards for Particulate Matter” (April 30, 2020).

Dear Administrator Wheeler and Staff:

On behalf of our member communities and their more than 650,000 residential, commercial, and industrial customers, I thank you for this opportunity to provide feedback on the proposed rule “Review of the National Ambient Air Quality Standards for Particulate Matter” (April 30, 2020).

Background on AMP/OMEA

AMP is a non-profit wholesale power supplier and service provider for 135 members, including 134-member municipal electric systems in the states of Ohio, Pennsylvania, Michigan, Virginia, Kentucky, West Virginia, Indiana, and Maryland and the Delaware Municipal Electric Corporation, a joint action agency with nine members headquartered in Smyrna, Delaware. AMP’s members collectively serve more than 650,000 residential, commercial, and industrial customers and have a system peak of more than 3,400 megawatts (MW). AMP’s core mission is to be public power’s leader in wholesale energy supply and value-added member services. AMP offers its members the benefits of scale and expertise in providing and managing energy services.

AMP’s diverse energy portfolio makes the organization a progressive leader in the deployment and procurement of renewable and advanced power assets that include a variety of base load, intermediate and distributed peaking generation using hydropower, wind, landfill gas, solar and

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fossil fuels, as well as a robust energy efficiency program. AMP has actively worked over the past decade to diversify our power supply portfolio, to the point that our owned and managed assets, and contracted power were approximately 19% renewable in 2019. Our fossil fuel assets currently include a 368 MW ownership share of the 1,600 MW coal-fired Prairie State Generating Co. (PSGC) located in Lively Grove, Illinois, as well as the 707 MW (fired) natural gas combined cycle AMP Fremont Energy Center in Fremont, Ohio. Most of AMP's members are in the PJM Interconnection, LLC regional transmission organization (RTO) footprint, while some members are located within the Midcontinent Independent System Operator, Inc. (MISO) footprint. The OMEA represents the Ohio and federal legislative interests of AMP and member Ohio municipal electric systems. Subsequent "AMP" references herein also represent the interests and comments of OMEA.

In recognition of our unique position as both a wholesale power supplier and services provider, as well as the owner and operator of electric generating assets, AMP offers the following comments in support of the proposed rule.

AMP Supports the Proposed Action to Maintain the Existing PM Standards

The United States Environmental Protection Agency ("USEPA"), in consultation with the Clean Air Scientific Advisory Committee ("CASAC"), concluded that there was not sufficient scientific evidence to support the revision of the existing PM standards. Maintaining the current standards provides regulatory certainty for our members, and AMP supports this decision.

AMP Supports Improvements to the NAAQS Review Process

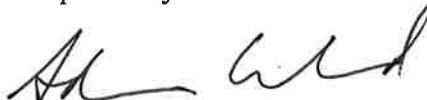
USEPA has routinely not met the Clean Air Act's ("CAA") statutory five-year deadline for review of National Ambient Air Quality Standards ("NAAQS"). This is largely due to the complex review process utilized by USEPA in the past. Not reviewing NAAQS in a timely manner can potentially affect public health, as well as negatively impact the planning of economic activities. For these reasons, we commend USEPA's commitment to complete the Particulate Matter ("PM") standard review by the end of 2020. Doing so acknowledges the importance of complying with the CAA review process established by Congress.

Further, AMP supports the procedural reforms implemented as part of the review process for this proposed PM standard. In a 2018 memorandum, the Administrator outlined a plan to streamline the NAAQS review process, with the goal of increasing timeliness and efficiency while remaining protective of human health and the environment.¹ USEPA is implementing many of those reforms in the current review by conducting more robust information gathering during early stages of the review, focusing on the most recent and most policy-relevant science, combining risk and policy documents, and avoiding "multiple draft reviews whenever possible".

¹ Memorandum: Back-to-Basics Process for Reviewing National Ambient Air Quality Standards, USEPA (May 9, 2018).

We are encouraged by USEPA's efforts to streamline the NAAQS review process in a manner that better comports with the CAA. We ask that USEPA continue to implement additional process changes that ensure greater efficiency and predictability for our members, while continuing to protect human health and the environment. Thank you for this opportunity to provide input to the agency on the proposed action.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Adam Ward', written in a cursive style.

Adam Ward,
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