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Testimony of Nancy F. Parks
Chairperson of the Sierra Club, Pennsylvania Chapter, Clean Air
Committee
At Environmental Quality Board Hearing, March 20, 2006, 7 pm
Harrisburg
36 PaB. 715 and Pa. Bulletin Doc No 06-221

Good evening. I am Nancy F. Parks, chair person for the Sierra Club, Pennsylvania Chapter's Clean Air Committee.

In Pennsylvania we need all the help that we can get to reduce air pollution, either from our vehicles or from our businesses.

Within our ozone smog and acid deposition pollution reduction programs here in Pennsylvania, we now control the "low hanging fruit" of nitrogen oxides pollution [NOx] and volatile organic chemical pollution [VOC], i.e. the NOx and VOC that is easiest and cheapest to control from the largest existing sources like power plants and our own motor vehicles. That low hanging fruit controls only about 25% of the all the NOx emitted & measured here in Pennsylvania. Therefore, there still remains a large inventory of ozone smog and fine particle soot forming pollution that is, frankly, readily available to make the lives and the health of all Pennsylvanians, miserable.

The Clean Air Act protects all Americans by requiring that dangerous pollutants be controlled with - in statutory language - "... an ample margin of safety". PADEP did the right thing when they chose to evaluate and consider the best possible programs for reducing dangerous air pollutants from cars, pickup trucks and minivans. They chose to examine and to propose for adoption, the best possible pollution reduction program that can help Pennsylvania provide that ample margin of safety for our citizens with chronic respiratory disease and other vulnerable populations.



HEALTH DATA:

The *State of the Air 2005: Pennsylvania* report by the American Lung Association detailed the risks for health sensitive and vulnerable persons from mobile source based air pollution for both urban and rural counties.

Allegheny County/Pittsburgh:	22,977 pediatric asthma 270,004 population under 18
Beaver County/Pittsburgh:	3,284 pediatric asthma 38,589 population under 18
Centre County:	2,024 pediatric asthma 23,785 population under 18
Lancaster County:	10,610 pediatric asthma 124,674 population under 18
Philadelphia County:	31,627 pediatric asthma 371,643 population under 18

I will not describe the health effects to you tonight because I am sure that my able colleague – Kevin Stewart – of the Pennsylvania Chapter of the American Lung Association will present their latest information to you.

I would like to describe the extent of the problem from motor vehicle pollution for a number of both urban and rural areas of the state.

The most recent emissions inventory with certified data is from the year 2002. The emitted pollution in Pennsylvania from motor vehicles is shown below by table for each of the major pollutants for highway and off-highway pollution – i.e. construction, agriculture, mining and recreation – and their percent of total for the particular area of the state. This is actual measured and verified pollution, and not an estimated and modeled SIP – i.e. state implementation plan – inventory.

Nitrogen oxides [NOx] in tpy or tons per year:

STATE	PHILADELPHIA	LANCASTER	PITTSBURGH	STATECOLLEGE
Highway = 346,471 tpy	H = 62,734 tpy	H = 12,620 tpy	H = 58,609 tpy	H = 6281 tpy
Off Highway 123,519 tpy	OH = 38,069 tpy	OH = 3605 tpy	OH = 37,803 tpy	OH = 750 tpy
H = 39.5% OH = 14.1% of total all statewide NOx	H = 44% OH = 26% of total Philly NOx	H = 56% OH = 16% of total Lancaster NOx emitted	H = 27% OH = 17% of total Pittsburgh- Beaver NOx	H = 63% OH = 8% of total rural State College NOx

Volatile Organic Chemicals [VOC] in tpy or tons per year:

STATE	PHILADELPHIA	LANCASTER	PITTSBURGH	STATECOLLEGE
Highway = 176,090 tpy	H = 33,900 tpy	H = 7361 tpy	H = 29,384 tpy	H = 2666 tpy
Off Highway 84,776 tpy	OH = 20,381 tpy	OH = 4321 tpy	OH = 14,824 tpy	OH = 454 tpy
H = 31.5% OH = 15.2% of total all statewide VOC	H = 26% OH = 15.7% of total Philly VOC	H = 22% OH = 12.9% of total Lancaster VOC emitted	H = 21.7% OH = 11% of total Pittsburgh- Beaver VOC	H = 13.7% OH = 3.4% of total rural State College VOC

The information that I believe is important from these tables is that NOx and VOC pollution emitted in Pennsylvania is very large in quantity and that it is ubiquitous in our environment and in our air. It is, in fact, a significant detriment to human health in both rural and urban areas.

We need pollution controls on our vehicles to help with controlling ground-level ozone smog, acid rain, & tiny soot particles. We need these pollution controls that PADEP has proposed to meet our federal obligations under the 1990 Clean Air Act Amendments; a law that is truly complex, but also just as truly successful in reducing air pollution over the long term. I have devoted the last 24 years of my professional life to cleaning up air pollution in Pennsylvania especially, and across the nation. I fought for inspections to clean up and maintain our personal cars. I fought for the federal Tier II standards. But now we have the opportunity to join with 10 other states – many in the northeast, like New York and New Jersey to support a regulation that is better than Tier II; this regulation will get us to the point where we need to be; where we must be; the point where we are protecting the health of our most vulnerable citizens → with an “ample margin of safety” as is required under the fore-thinking Clean Air Act.

The Sierra Club asks you to approve the best possible regulation to control air pollution from motor vehicles; i.e. the PADEP Clean Vehicles Program regulation as presented.

Thank you for the opportunity to testify tonight.

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