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**TESTIMONY OF TOM HOFFMAN** 2014 JUN -2 PM 3:12  
**WESTERN PENNSYLVANIA DIRECTOR**  
**CLEAN WATER ACTION**  
**RE: ADDITIONAL RACT REQUIREMENTS FOR MAJOR**  
**SOURCES OF NO<sub>x</sub> AND VOCs**  
**25 PA. CODE CHS. 121 AND 129**  
**DEP OFFICES ON HERR'S ISLAND**  
**5.27.14**

Good afternoon. My name is Tom Hoffman. I am the Western Pennsylvania Director for Clean Water Action. Clean Water Action has offices in 17 states – including 3 here in Pennsylvania. We have 1.2 million members in the country and over 100,000 of those live in Pennsylvania. We are also a member of the Breathe Collaborative, a coalition of organizations that work to clean up air pollution here in Western Pennsylvania.

Our Collaborative has a three part mantra:  
The pollution in our air is making us sick  
Much of the pollution we breathe comes from right here in Western Pennsylvania  
It is within our control to reduce air pollution in Pittsburgh

Just a few weeks ago, the American Lung Association released its annual State of the Air Report. It reported that for ozone, the pollutant we're here to talk about today, our region got three places worse than last year - 24<sup>th</sup> worst in the nation to 21<sup>st</sup> worst. Almost all regions in the country had worse ozone numbers this year over last because it was hot – a situation that is bound to keep happening under our new regime of climate change - but our area fell because we have not been aggressive enough about curbing ozone producing pollutants. Because our polluters have not been cutting back, 25,000 kids in Allegheny County have chronic asthma – the pollution in our air is making us sick – check.

The Post Gazette did its usual “the report is flawed editorial”. A key part of their line is that our pollution comes from out of state so there's not really anything we can do. But Sierra Club research shows that, for example, that coal fired power plants in Pennsylvania emit ozone producing pollutants at 3 to 9 times higher than a comparable plant in Maryland just next door. Much of our pollution comes from right here in Pennsylvania – check

But now comes the most incredible part – 5 of the 8 big coal-fired plants in Pennsylvania have technology that can cut ozone producing pollutants drastically but they don't turn it on all the time. And a sixth plant is installing the equipment. How did we get in this Alice In Wonderland situation I hear you cry? Under the current regulations, the state's coal fired power plants ACTUALLY emitted about 93,000 tons of smog causing pollution every year for the last couple of years.

(over)

Under the guidelines being proposed today, these same plants COULD emit 132,000 tons in a year – a more than 40% INCREASE. *They could turn their equipment off even more.* The equipment designed to protect our lungs from smog. That's just nuts. It is within our control to reduce air pollution in Pittsburgh - check.

To get us back out of the rabbit hole, the new guidelines – at minimum – need to do the following:

1. Reduce the allowable NOx emission levels to a level that requires the plants to turn their smog controlling devices on ALL THE TIME.
2. Operators have to reduce pollution at EACH ONE OF their plants – not just hit some average for the state. EVERY Pennsylvanian deserves to be protected from dangerous smog
3. When we have a bad air day in Pennsylvania (by the way we had a corker on January 5<sup>th</sup> – only a few points better than Beijing in the Mon Valley) we are all asked to not mow our lawns, don't fill our gas tanks, cut back on our driving. Our state's coal plants need to be good citizens and not emit high levels of ozone causing pollutants also.

Thank you for your time.