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Public Hearing on Proposed Rulemaking
Additional RACT Requirements for Major Sources of NOx and VOCs
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Good afternoon. My name is Valessa Souter-Kline and I am an outreach coordinator at PennFuture. I work in our Pittsburgh office located at 200 First Ave. PennFuture is a statewide public interest membership organization working to create a future where nature, communities and the economy thrive.

I appreciate this opportunity to comment on the proposed rulemaking for additional RACT requirements for major sources of NOx and VOC emissions. PennFuture will also be submitting written comments to the Environmental Quality Board by the June 30th deadline.

It is critical that Pennsylvania take advantage of this opportunity to further reduce NOx and VOC emissions in order to protect public health in Southwestern Pennsylvania. As the precursors to ozone, NOx and VOC emissions pose a real and significant threat to the health of citizens across our state, but they have a particularly significant impact here in Allegheny County. Asthma and other respiratory, lung and heart diseases are all linked to ozone and, as research has shown, we suffer high rates of these illnesses in southwestern PA. In fact, school nurses estimate that as many as half of Pittsburgh Public School students could have asthma, which is well above the national average. It is no coincidence that many sources of smog pollution are clustered in this part of the state as well.

In 2013, Allegheny County Health Department's Air Quality Annual Data Summary revealed that the county's monitors were in nonattainment of the 8 hour ozone standard for "the seventh consecutive 3-year period." That is unacceptable. Unless we strengthen our efforts to control smog pollution, it will only worsen. Further, scientists at CMU and elsewhere have demonstrated a clear correlation between climate change and increased smog pollution. As a result, future climate contributions will exacerbate smog pollution, requiring greater efforts simply to maintain existing levels of pollution, much less reduce harmful smog.

One way to combat the smog problem is to incorporate additional RACT requirements into the State Implementation Plan and I commend the DEP for taking such an important step. The current proposed rules, however, will not serve to adequately reduce smog because it will not require the use of Selective Catalytic Reduction (SCR) at existing coal fired power plants.

Existing coal fired power plants are the largest single source of NOx emissions in Pennsylvania. Even though SCR has already been installed at many of Pennsylvania's coal fired power plants, the RACT requirements will not require use of the technology to further reduce NOx emissions.. Not requiring emissions control at levels achievable with SCR creates the potential for industry to turn off SCR at plants where it is already installed, while still meeting their emissions thresholds. This is a bad policy decision that fails to take advantage of this opportunity to improve air quality for residents of Southwestern Pennsylvania.

(over)

In addition to our recommendation to include SCR, PennFuture also objects to the proposed rule to average emissions on a 30 day rolling basis and across facilities. Such an allowance provides the real possibility that plants in compliance with the law statewide can still expose localized communities to dangerous pockets of smog pollution. Air quality is often a local issue and it is unacceptable to average emissions at the state level in a manner that doesn't provide safe air for everyone. Pollution should not be prioritized in some regions and ignored in others.

Based on these issues, I request that you revisit the proposed rule and ensure that it ensures significant reductions in allowable NOx and VOC emissions rates by establishing a RACT limit that requires the use of SCR at existing coal fired power plants, and requires that those reductions take place at every facility, in every community, and not be averaged across facilities. All Pennsylvania's deserve to breathe clean air that won't make them sick.

Thank you for your time and attention today