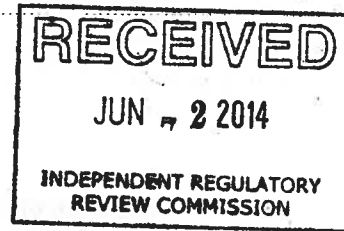


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5/28/14

Testimony Re: Proposed Rulemaking regarding Additional RACT Requirements for Major Sources of NOx and VOCs [25 PA CODE CHS. 121 and 129]

Robin Mann, 266 Beechwood Drive, Rosemont, PA 19010

Thank you for the opportunity to testify on this proposed rule. I am Robin Mann. I live at 266 Beechwood Drive, Rosemont, PA 19010, in Delaware County. Delaware County, along with all of Southeastern Pennsylvania Counties, fails to meet the nation's safe ozone standards, putting our population at risk and especially those most vulnerable to high levels of smog pollution. Children are especially vulnerable to smog pollution, and as of 2 years ago we already had over 13,000 kids with asthma in Delaware County, alone. The health of our citizens who have limited incomes or are living in poverty is also especially vulnerable to smog pollution, and there are more than one in ten residents of Delaware County in that category.

So, I appreciate that the Corbett administration is moving ahead to tackle smog pollution and improve our air quality, but I am concerned that they are not effectively confronting the largest single source of smog-causing NOx pollution in the state, namely coal-fired power plants. For several reasons, the proposed standards would not result in reduced smog pollution and safer air for people in the region and across Pennsylvania.

First, the proposed rule puts forward a "reasonably available control technology" that actually lags behind what is already in place in most of the non-retiring coal-fired power plants. What is "reasonable" about that?

Secondly, all of the largest coal-burning plants in Pennsylvania already meet the proposed NOx emission rates. So how are the new standards going to result in reduced smog pollution and help Delaware County and other Pennsylvania Counties improve their air safety grade from "F"?

Third, stronger, more protective standards have been put in place in our neighboring states of MD, DE and NY. Pennsylvania's proposed emission limits are multiple times higher. What is "reasonable" about that?

Fourthly, the Corbett administration is proposing that coal plants meet emission limits on a 30-day rolling average basis. This approach utterly fails to meet the national 8-hour standard for ozone, instead allowing for large swings in NOx and VOC emissions over a 30-day period. But this obviously ignores that people don't average their breathing; they need to breathe all day, every day.

Finally, the Corbett administration's rule would let operators aggregate their pollution across multiple burning units even in multiple locations. But this approach would allow operators to pick and choose where emission limits will be