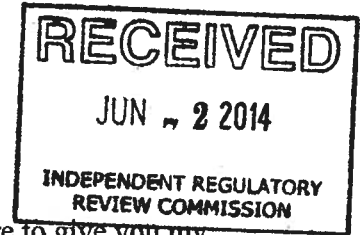


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TESTIMONY ON PROPOSED "SMOG" RULE FOR RACT REQUIREMENTS
25 PA CODE CHS 121 AND 129
MAY 28, 2014

BY SUSAN EDWARDS
32 COLLEGE AVE., SWARTHMORE, PA 19081



My name is Sue Edwards, and I am a concerned citizen from Swarthmore, PA, here to give you my feedback about the proposed Reasonably Available Control Technology (RACT) requirements for nitrogen oxides and volatile organic compounds (Nox and VOCs) under consideration by the Department of Environmental Protection for Pennsylvania.

I am a retired educator and an environmental activist volunteering in the Philadelphia area with a number of environmental organizations. I do not claim to be a scientist nor an air pollution expert, but I try to stay abreast of developments that affect the health of the people of this state, nation, and world as well as the future of our planet. I see that as part of my responsibility as a human being.

As I understand it, coal-fired power plants release more smog-related pollutants than any other source in our state. And I understand that most of our state's largest coal plants have installed the technology they need to decrease the amount of nitrogen oxides they emit by 40%, but in many cases they don't use it. The proposed standard would allow these plants to continue to not use this technology and to belch pollutants at a rate as much as 9 times greater than they have so far! I find this incomprehensible.

There is a link between smog pollution, rising temperatures resulting from greenhouse gas related climate change, and respiratory illnesses. In my environmental advocacy, I am constantly running into residents in the Philadelphia area of all ages who suffer from asthma. Several of them are my dear friends. I've learned that asthma rates in Philadelphia are approximately double the national rate, and nationally, asthma increased 50% among black children between 2001 and 2009. As I assume you are aware, asthma is a potentially deadly illness. How can we call ourselves reasonable people and allow health-threatening pollution to increase rather than take steps to shrink it?

According to an article in the Philadelphia Inquirer this past Sunday, May 25th, titled "Racial Disparities in Air Pollution," which focused on nitrogen dioxide, Pennsylvania "ranks No. 2 [in the nation] in the size of the exposure difference between whites and nonwhites, a measure of what is known as environmental injustice." This does not seem to me to be a ranking to be proud of. Yet the proposed RACT standard would allow coal plants to keep the air in some communities cleaner than others, a fact highly likely to continue this racial disparity. I'm familiar with the difference in air quality between Swarthmore, where I live, and Chester, just down the road. Power plant operators should be required keep the air around ALL of their plants clean, and not be permitted to average their emission of nitrogen oxides over a month-long period of time, which could make some "bad air days" intolerable for those with respiratory illnesses.

I hope the Department of Environmental Protection will take a new look at the proposed standards and strengthen them for the health of all.

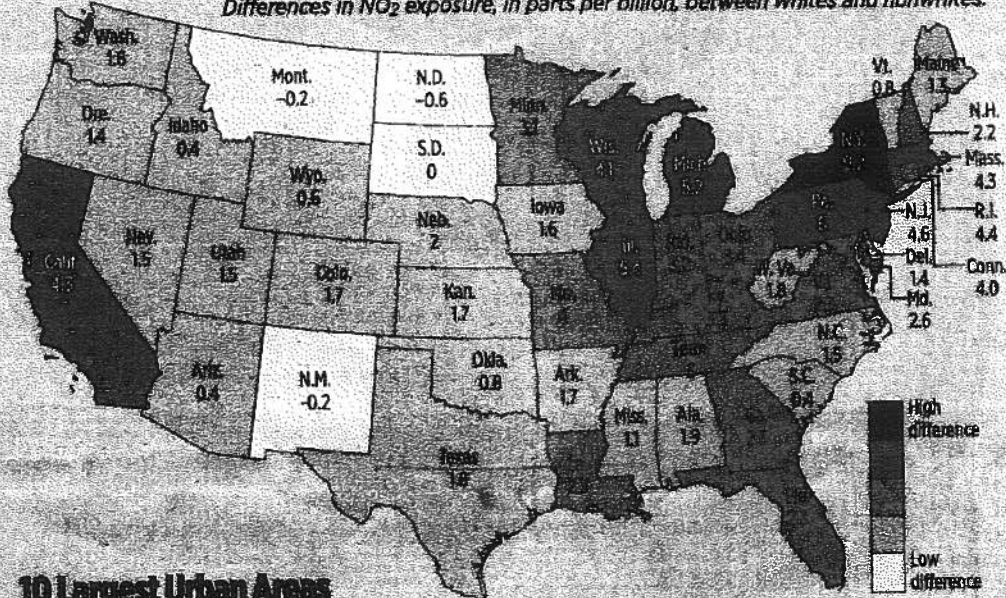
VITAL STATS | BY DON SAPATKIN

Racial Disparities in Air Pollution

Nonwhites are exposed to **39 percent higher** average concentrations of nitrogen dioxide — a key pollutant — than whites, according to a new analysis of demographic and air-quality data in the continental United States. Researchers projected that equalizing exposure at whites' average level would prevent **7,000 heart disease deaths** a year among nonwhites.

NO₂ is emitted primarily by combustion in motor vehicles and power plants. The highest concentrations for all races are in the Northeast, due largely to population density as well as industrial activity and unfavorable wind patterns. **Pennsylvania** ranks No. 2 in the size of the exposure difference between whites and nonwhites, a measure of what is known as environmental injustice. **New Jersey** is No. 5.

Differences in NO₂ exposure, in parts per billion, between whites and nonwhites.



10 Largest Urban Areas

White and nonwhite Philadelphia-area residents are exposed to the third-highest NO₂ concentrations of more than 400 urban areas.

Rank/Urban area*	Avg. NO ₂ concentration nonwhites	Avg. NO ₂ concentration whites	Difference in concentrations
1. New York-N.J.-Conn.	25.2	21.2	4.0
2. Los Angeles-Long Beach-Santa Ana	26.0	23.1	2.9
3. Chicago	17.9	15.4	2.5
4. Miami	13.1	11.8	1.3
5. Phila.-Pa.-N.J.-Del.-Md.	19.6	16.1	3.5
6. Dallas-Fort Worth-Arlington, Texas	13.8	13.3	0.5
7. Houston	14.5	12.9	1.6
8. Washington-Va.-Md.	13.8	12.6	1.2
9. Atlanta	11.9	10.3	1.7
10. Boston-Mass.-N.H.-R.I.	17.6	14.3	3.2

*Urban areas ranked by population

SOURCES: PHO ONE; Julian D. Marshall, University of Minnesota; U.S. Census Bureau

RYAN WIARANGWAN and MIKE PLACENTRA / Staff Artists