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**Testimony on Proposed Rulemaking  
Additional RACT Requirements for Major Sources of NOx and VOCs  
25 PA. CODE CHS. 121 AND 129  
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Good afternoon, my name is Tom Schuster, my home address is 605 23rd Street, Windber, PA 15963. I'm speaking today on behalf of myself, my family, who was not able to join me, and especially my sister, who has asthma and is pregnant.

She was told by her doctor that she should avoid using her inhaler except in emergencies because the drug is considered unsafe for developing fetuses. At the same time, being pregnant increases her risk of lung inflammation to begin with, which puts her in a pretty tight spot. Because her job required exposure to bad air, and she was noticing a worsening of her asthma symptoms, she made the difficult decision to resign to protect the health of her unborn babies.

I also have a 3-year old daughter, who is very active outside. But we live in an area that has seven coal-fired power plants within an hour's drive, including the 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, and 8<sup>th</sup> largest in the state. I worry about her all the time because her lungs are still developing and the more she is exposed to harmful air pollution, the more likely she is to develop asthma or other respiratory illness.

That is why I stand here today to ask the Department of Environmental Protection to live up to its name. Under Governor Corbett, the DEP has issued draft rules for smog-causing pollution that utterly fail to control the emissions from the largest single source in the state, coal-fired power plants. It would even allow most plants to significantly increase their pollution compared to current levels.

It would also allow polluters to pick and choose when and where they pollute the most. For example, emissions of smog-causing NOx pollution could be averaged over a 30-day period. But smog pollution varies greatly from day to day, depending on weather conditions. So under this proposed rule, a power plant could pollute like crazy, even during the worst smog days, making the air even less safe to breathe, and greatly endangering people like my sister, my daughter, and the millions of other Pennsylvanians who are especially vulnerable. Then, as long as the plants reduce their pollution at some point during the next 30 days, they would be in full compliance with the law.

But there is another averaging problem. Plant operators can also average pollution across their entire fleet of power plants, regardless of how far away they are. So if one plant has the ability to cut pollution while another one does not, the company can comply with the rule while the residents near the polluting plant will continue to suffer health problems. It is completely unfair that these pollution hot-spots would be allowed by Governor Corbett's DEP. Nothing is more important than health, and a power company should not be allowed to make decisions based on profit motives that make our families sick. All people have a right to breathe clean, healthy air.

(over)

The good news is that 80% of the coal-fired power capacity in this state is already equipped with state-of-the-art technology to cut smog-causing emissions. The bad news is that many are not using it consistently, and are polluting much more than they are capable of. Governor Corbett and the Department of Environmental Protection need to put a stop to this, for my sister, my daughter, and all Pennsylvanians at risk. It isn't very hard:

1. NOx emission limits must be set at a level consistent with effective operation of Selective Catalytic Reduction, which is already commonplace in the Commonwealth.
2. Each coal plant must be responsible for reducing its own pollution instead of allowing companies to group all of their plants together. Operators should not be allowed to pick and choose which communities get clean air.
3. The emission of high levels of smog-causing pollution on already bad air days must not be allowed. The only way to ensure compliance with the Clean Air Act is to set short term pollution limits for NOx.

Thank you for your time.