

3052

RECEIVED
IRRC

Testimony on Proposed Rulemaking
Additional RACT Requirements for Major Sources of NOx and VOCs
25 PA Code Chapters 121 and 129
5/27/2014

2014 JUN -2 PM 1: 01

Rev. William Thwing
610 Luzerne street
Johnstown, PA 15905
814-539-9333
e-mail: istchurch1@verizon.net

Good afternoon. My name is Bill Thwing. I am a local church pastor in Johnstown, Pennsylvania and the past president of the Pennsylvania Chapter of Interfaith Power and Light, which is a faith based organization with a national membership of over 10,000 congregations in 40 states which advocates for energy efficiency, energy conservation and the use of clean renewable energy

The Constitution of the state of Pennsylvania in article 1, section 27 states that the citizens of Pennsylvania have a right to clean air and that as a trustee of this natural resource, the Commonwealth shall conserve and maintain it for the benefit of all the people". It is my assumption that it is the mandate of the Pennsylvania Department of Environmental Protection to uphold and enforce the constitutional rights of the citizens of Pennsylvania.

Ground level ozone, or smog as we call it which is caused by among other things the 93,000 tons of Nitrogen oxide effluent emitted every year by the 8 largest non-retiring Pennsylvania coal burning Power plants. It is well known that exposure to smog, even a short time periods, causes a range of health problems including: coughing, throat irritation, shortness of breath, asthma, heart attacks, permanent lung damage and even premature death. Eight million Pennsylvanians or two thirds of all of our citizens of our great state live in areas which do not meet current federal standards for ground level ozone. That includes 1.2million of our seniors, 1.7 million of our children and 750,000 documented asthmatics, our states most vulnerable citizens.

Why then is the Pennsylvania Department of Environmental Protection proposing new regulations that will increase the NOx emissions from these 8 power plants, representing 95% of non-retiring coal fired capacity in the state by 40% - from 93,000 tonnes / year to 132,000 tonnes per year? It appears that the Corbett Administration version of the Department of Environmental Protection, instead of performing your constitutionally mandated role of

protecting the environment and improving the quality of the filthy unhealthy air that Pennsylvanians are forced to breath, you are proposing regulations that will further damage our air and our health and our lungs which will doubtlessly cost our citizens millions of additional dollars/ year in health care costs. It would almost appear that instead of protecting the environment, you are protecting the interests of the coal industry.

To add insult to injury, It is our understanding that 5 of the 8 non retiring coal burning power plants are already equipped with Selective Catalytic Reduction (~~SEC~~^{SCR}) Technology which if turned on would dramatically reduce the amount of NOx effluent produced each year. The Morgantown Plant in Maryland uses this same technology and has reduced their NOx effluent to about 1/9 of what the new proposal is recommending. Why are we not using to full capacity, the technology which is already installed on these power plants? Why are we not requiring all of these 8 install and employ this technology? Why is the Corbett Administrations Department of Environmental Protection not performing it's constitutionally mandated duty?

A further questionable component of the proposed new regulations is the "Averaging" components. The new regulations seek to abandon the accepted Clean Air Act compliant 1 hour and 8 hour standards, and replace them with a 30 day averaging and a fleet-wide averaging rule. These changes have great potential for abuse. There would have to be very clear, life affirming, human and environmental health protecting reasons for these changes. If enacted any changes would have to be transparent, strictly monitored and enforced after a proven probation. Public trust is essential for the PA DEP to accomplish its constitutionally mandated mission of protecting the environment on behalf of the citizens of Pennsylvania. Currently that public trust is low.

Thank you for your time.