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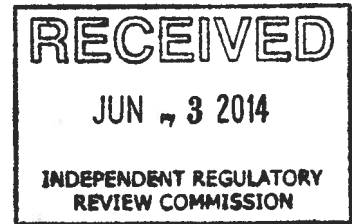


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**Public Comment of the League of Women Voters of Pennsylvania  
To the Pennsylvania Environmental Quality Board  
regarding Pennsylvania Department of Environmental Protection's**

**Proposed Rulemaking amendments to Chapters 121 and 129**

**Harrisburg, Pennsylvania**

**May 29, 2014**

Good afternoon, I am Susan Carty, President of the League of Women Voters of Pennsylvania for whom I am speaking. We sincerely appreciate this opportunity to provide input to the Pennsylvania Environmental Quality Board with regard to the current proposal for additional RACT (reasonably available control technology) requirements and emission limitations for certain major stationary sources of oxides of nitrogen plus volatile organic compound emissions. (VOC)

Approximately 13 years ago, I joined a NOAA scientific expedition aboard the ship, The Ron Brown, crossing the Pacific Ocean from Hawaii to Japan in 40 days. My role was that of "Teacher at Sea." The project was titled ACE-ASIA, which stood for **Asian Pacific Regional Aerosol Characterization Experiment**. It was the fourth expedition designed to increase understanding of how atmospheric aerosol particles affect the Earth's climate system. You will find a paper describing this project attached to my comments.

The experience of traveling at sea for 40 days, left an indelible, life-changing impression in my mind. Experiencing real scientific research methods "in the field" in person, 24/7 for 40 days would give anyone a new perspective on life.

Seeing first hand the immense, extraordinary plumes of pollution rising up into the atmosphere from the Asian coastline gave me a "sight of reality". It is an ugly reality. And it most certainly is a dangerous reality. The satellite images were overwhelming. And..those images continue today.

What we spew into our atmosphere not only rises to recombine chemically with other pollutants, but it also rains down on us, into our water and into our lungs.. In that process of atmospheric release, there also exists an infinite variety of chemical reactions between polluting atmospheric aerosols – both wet and dry. Both natural and man-made.

Now 13 year later, I am in this position, with the LWVPA, to express the deep concern of our membership across Pennsylvania. They fear for the future viability of the air we breathe now and for generations to come. Pennsylvania has a dismal history regarding air quality. It also has the dubious honor of experiencing the worst air pollution disaster in US history (1948 – Donora) 20 deaths "The Donora smog event, the worst air pollution disaster in U.S. history, let the public know that industrial pollution could kill. It eventually led to the Clean Air Act and state and federal agencies that regulate pollution"

That history continues to demonstrate to the nation that industrial air pollution is not just unpleasant, it is potentially lethal. Today, Pennsylvania continues to struggle with poor air quality. Pennsylvania continues to fail to meet the federal health-based air quality standards.

Proposing a lax rule that provides for the averaging of Nitrogen Oxide emissions over a utility's entire fleet serves only one purpose – and that purpose does not include, consider or acknowledge the most basic of human life needs for a healthy life – clean air. We view this situation as letting the power plants off the hook.

Would we willingly drink water that contained the averaged acceptable amounts of effluent? Would we serve that to our children? Why would anyone want to breath "averaged air" ?

Nitrogen oxides, which are commonly released in car exhaust and cigarette smoke and by burning fossil fuels, can contribute to respiratory problems and lung damage on their own as well as when they are combined with sunlight and volatile organic compounds to form smog.

Governments and individuals make trade-offs regularly through policy making. In our case today, we are looking at a proposal that offers a trade-off in how nitrogen oxide emissions are managed and measured. Are the parameters of acceptable nitrogen oxide measurements in this proposal designed to offer relief to an industry that has polluted our air and water for decades? Or are the trade-offs designed to provide economic relief to those who cannot afford more regulations or are they designed to attract more investors in the energy conversion industry?

Does this new proposal also aim to provide relief to the natural gas industry, with particular relief for compressor stations that release and vent toxic gases? Each station emits a mix of pollutants - volatile organic compounds (VOCs), nitrogen oxides (NOx), formaldehyde and greenhouse gasses - in varying amounts that are limited by the type of permit governing the site. By the end of 2012 there were almost 400 approved permits for compressor stations.

Where and how do the citizens of Pennsylvania benefit from this proposal?

Through the averaging process, the proposal does not require individual facilities to meet the standards, but rather that the power-plant operators comply "on average" across their facilities. The proposal establishes the platform for an imbalance of environmental impacts. Certain locations will experience hazardous smog even if the problem is no longer visible in official numbers gathered across the board. The stage for the creation of dangerous pollution hot spots would be set.

We, the LWVPA, strongly request that you do not impose this new method of measurement of nitrogen oxides and that you hold each and every power plant responsible and accountable for its' pollution emissions. We ask that you require emission reductions at all sources in a given system. And we ask you to measure emissions in a manner that is consistent with the protections of human health that was intended by the National Ambient Air Quality Standards for ozone.

**Our grandchildren will thank you and history will thank you as well!**

International Global Atmospheric Chemistry Project

# ACE - Asia

Asian Pacific Regional Aerosol Characterization Experiment

[Program Description](#)

[ACE-Asia Publications](#)

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The Aerosol Characterization Experiments (ACE) are designed to increase our understanding of how atmospheric aerosol particles affect the Earth's climate system. ACE-Asia was the fourth in this series of experiments organized by the International Global Atmospheric Chemistry (IGAC) Program (A Core Project of the International Geosphere Biosphere Program).

ACE-Asia took place during the spring of 2001 ([schedule](#)) off the coast of China, Japan and Korea ([map](#)). The ACE-Asia region includes many types of aerosol particles of widely varying composition and size derived from one of the largest aerosol source regions on Earth. These particles include those emitted by human activities and industrial sources, as well as wind-blown dust. Results from ACE-Asia have improved our understanding of how atmospheric aerosols influence the chemical and radiative properties of the Earth's atmosphere. Specifically:

1. The dust we can observe by satellite, transported half way around the globe, is not just dust, it is **dust mixed with pollution**. Air pollution changes dust aerosols in many ways, adding black carbon, toxic materials, and acidic gases to the mineral particles. Atmospheric chemistry and its impact on air quality and climate change are truly global issues.
2. We can not measure dust in one region and assume that dust everywhere around the Earth has the same impact on climate. The dust that is transported from East Asia to the Pacific **does not absorb as much light** as the dark aerosol from South Asia or some previous measurements of dust from the Sahara Desert. There are dramatic regional differences in the chemical and optical properties of aerosols.
3. Combining ACE-Asia suborbital and satellite measurements yields monthly average (April 2001) **cloud-free aerosol radiative forcing at the surface exceeding  $-30 \text{ W m}^{-2}$**  in a plume covering the Yellow Sea, East China Sea, Sea of Japan and region downwind of Japan.

The Power Point slide presentation "What have we learned from ACE-Asia", presented by Barry Huebert at the Fall 2002 Meeting of the American Geophysical Union can be downloaded [here](#).

Additional information about ACE □ Asia can be found in the [Project Prospectus](#).