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Testimony on Proposed Rulemaking
Additional RACT Requirements for Major Sources of NO_x and VOCs
25 PA Code Chapters 121 AND 129

The Group Against Smog and Pollution (GASP), a nonprofit environmental organization working for clean air in Southwestern Pennsylvania since 1969, made comments at the public hearing in Pittsburgh on May 27, 2014 on the proposed RACT regulation. The following additional comments come from our Athletes United for Healthy Air Campaign and on behalf of the undersigned organizations. We write to you in favor of stronger controls on smog-causing emissions from coal-fired power plants, and urge you to set emission limits in this rulemaking at levels that require coal-fired power plants in Pennsylvania to use control technologies that are already in use at many such plants in this region.

GASP works on reducing air pollution in many ways. For example, GASP evaluates and comments on air permits, encourages voluntary reductions in energy usage, and brings litigation against chronic, illegal polluters. The Athletes United for Healthy Air campaign educates those who are active outside on how to reduce their exposure to air pollution and how to take action to improve air quality. Outdoor air quality is especially important to those active outside, as they are taking in several times more air than those at rest. Athletes who participate in GASP's Athletes United campaign check air pollution forecasts, and often change the location or time of an outdoor activity—or cancel it altogether due to high pollution levels. It's frustrating to think that while we all work individually to protect ourselves, coal-fired power plants may be approved to put significantly more pollution into the air than they're currently emitting.

The RACT proposal puts limits on the amount of nitrogen oxides, or NO_x, that power plants can emit. NO_x is a harmful pollutant, causing or exacerbating various respiratory conditions. It can even cause premature death. NO_x also reacts in the atmosphere to help create acid rain and ground-level ozone. The Pittsburgh region already struggles to meet the federal, health-based ambient air quality standard for ozone. It's widely expected that this ozone standard will soon be lowered again, as the current limit is already known to not be protective of public health. Predicted climate trends will lead to more ozone formation, as heat is a driver of ozone creation. And recent studies highlight the relatively newly-discovered link between ozone and premature death from cardiovascular disease, a link that is sure to see much more research and attention and will contribute to future tightening of air pollution limits.

So it's very important to set a limit on NO_x that will reduce the amount of NO_x in the air. Since coal-fired power plants are the largest source of NO_x in Pennsylvania, we expect a stringent application of the law on this source. This proposal, however, would allow an estimated 42% more NO_x pollution from the state's eight-largest coal-fired power plants than what's already being achieved with current technology. NO_x emissions from these facilities could go from about 93,000 tons per year to just under

132,000 tons per year. That means these facilities could *turn off* their already-installed pollution control devices for as long as they wanted, pumping out ton after ton after ton of NO_x, until they met the loose limit.

This high limit seems contrary to law. The limit must be set according to what can be achieved with “Reasonably Available Control Technology,” or RACT. RACT is defined as “the lowest emissions limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.” Our region, to quote directly from the proposal: “shall develop and implement a program that mandates that certain major stationary sources develop and implement a RACT program.” Many coal-fired power plants in PA and beyond already use a technology called Selective Catalytic Reduction (SCR). These SCR units control emissions much more efficiently than the current proposal demands. In some cases, use of SCR at coal-fired power plants would reduce NO_x emissions by almost an entire order of magnitude compared to the proposed regulations. Five of the eight already-mentioned coal plants have installed this technology, and another plant is currently installing it. Many other coal-fired power plants around us use SCR. The process was first patented in the late 1950s. Even diesel vehicle manufacturers have begun using SCR technology to reduce emissions from large diesel vehicles. All of this strongly suggests that SCR technology is reasonably available, technologically feasible, and economically feasible—the definition of what is required by law.

This proposal, however, disregards SCR. Emission limits must be changed to match the fact that SCR is reasonably available and in fact already in place at most coal-fired power plants in Pennsylvania. For everyone bicycling on our trails, for the early morning walking groups, for all the sports teams from the Pittsburgh Steelers down to the grade school soccer leagues—for everyone enjoying our outdoors, lower the limit on NO_x emissions to a level that accounts for SCR technology.

Thank you.

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