

June 29, 2014

RECEIVED
IRRC

201 West Aaron Square

PO Box 120

Aaronsburg, PA 16820-0120

nfparks2@Verizon.net

3052

2014 JUN 30 PM 12: 55

Environmental Quality Board

PO Box 8477

Harrisburg, PA 17105-8477

www.ahs.dep.pa.gov/RegComments

COMMENTS ON PROPOSED RULEMAKING

25 PA CODE CHAPTERS 121 AND 129

ADDITIONAL RACT REQUIREMENTS FOR MAJOR SOURCES OF NOX AND VOC'S

PA. BUL 44 (16). APRIL 19, 2014

I AM NANCY F PARKS OF AARONSBURG VILLAGE, PENNS VALLEY, CENTRE COUNTY, PENNSYLVANIA. HAVING LIVED HERE FOR 34 YEARS, I HAVE WITNESSED SIGNIFICANT CHANGES IN AIR QUALITY WITH CONSEQUENCES FOR THE HEALTH OF PEOPLE IN MY VALLEY, IN STATE COLLEGE AND IN THE COUNTY.

SIMPLY STATED, THIS PROPOSED REGULATION (PA. BUL. 44(16) APRIL 19, 2014) IS NOT RACT. IT DOES NOT ACCOMPLISH REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT), BUT MAINTAINS A STATUS QUO THAT DOES NOT MEET THE FEDERAL CLEAN AIR ACT TEST OF REDUCING AIR POLLUTION EMISSIONS FOR NITROGEN OXIDES AND VOC'S (VOLATILE ORGANIC CHEMICALS) "... AS EXPEDITIOUSLY AS PRACTICABLE". IT DOES IN FACT ALLOW AN INCREASE IN NOX EMISSIONS.

THIS REGULATORY STATUS QUO WILL ALLOW UNACCEPTABLY HIGH LEVELS OF OZONE SMOG PRECURSORS POLLUTANTS TO CONTINUE TO AFFECT PENNSYLVANIANS INDEFINITELY. THE PADEP PROPOSED REGULATION ALLOWS POWER PLANTS IN PA TO EMIT UP TO 0.25 AND 0.45 LBS/MMBTU NOX, DEPENDING ON THE SIZE AND TYPE OF BOILER TECHNOLOGIES USED.

UNDER THE PROPOSED STANDARDS, THE SIERRA CLUB HAS DETERMINED THAT OF THE EXISTING COAL FIRED POWER PLANTS THAT ARE NOT RETIRING, THERE ARE EIGHT POWER PLANTS THAT WILL SPEW 132,000 TPY NOX, REPRESENTING 95% OF NON-RETIRING COAL FIRED CAPACITY.

CURRENTLY, THESE SAME POWER PLANTS HAVE ACTUAL EMISSIONS OF 93,000 TPY NOX.

CURRENT 93,000 TPY NOX VERSUS PROPOSED ALLOWABLE OF 132,000 TPY NOX?

THIS IS A VERY BAD IDEA. POWER PLANTS WILL BE ALLOWED TO INCREASE EMISSIONS, WHILE THE PURPOSE OF RACT IS TO DECREASE EMISSIONS. EPA WILL HAVE NO CHOICE BUT TO DISAPPROVE THIS PROPOSED REGULATION AND FORCE PADEP TO START AGAIN FROM SCRATCH. PENNSYLVANIANS WILL CONTINUE TO BE EXPOSED TO HIGH LEVELS OF DANGEROUS AIR POLLUTION. PENNSYLVANIA WILL ALSO BE OPEN TO MISSING REGULATORY DEADLINES AND THE POSSIBILITY THAT EPA WILL ISSUE A FEDERAL IMPLEMENTATION PLAN IN THE FUTURE.

ADDITIONALLY, MANY OF THESE PROVISIONS DO NOT MEET THE CAA REQUIREMENT FOR A MONITORED, VERIFIABLE, MEASUREABLE AND FEDERALLY ENFORCEABLE EMISSIONS CONTROL.

THESE EXISTING PLANTS CAN USE ALREADY CONSTRUCTED EMISSION CONTROL TECHNOLOGY, SPECIFICALLY SELECTIVE CATALYTIC REDUCTION (SCR), TO LOWER THESE EXISTING EMISSIONS. FIVE POWER PLANTS ALREADY HAVE INSTALLED SCR AND A SIXTH IS IN THE PROCESS OF DOING SO. UPON COMPLETION OF THAT PROJECT, 80% OF THE EXISTING NON-RETIRING CAPACITY OF PA'S APPLICABLE POWER PLANTS WILL HAVE SCR. SCR CAN REDUCE NOX EMISSIONS AS LOW AS 0.05 LBS/MMBTU.

THE RACT LIMIT SHOULD BE 0.05 LBS/MMBTU NOX.

BUT, POWER PLANTS WITH SCR ARE CURRENTLY OPERATING AT THREE TO NINE TIMES THAT 0.05 LBS/MMBTU CAPABILITY, INDICATING THAT THESE POLLUTION CONTROL TECHNOLOGIES ARE TURNED OFF. WHILE THE USE OF SCR MAKES ELECTRICITY PRODUCTION SOMEWHAT MORE EXPENSIVE AND THEY COULD POSSIBLY BE DISPATCHED BY PJM LESS OFTEN, OTHERS SAY THAT PJM IS DISPATCHING ACCORDING TO EFFICIENCY AND THE EXISTENCE OF SCR ON A PLANT COULD MAKE IT MORE DESIRABLE TO DISPATCH. TURNING OFF POLLUTION CONTROL EQUIPMENT IS ILLEGAL AND UNACCEPTABLE. THIS USE OF SCR HAS BEEN ACCEPTED AS PART OF PENNSYLVANIA'S SIP. WHY HAVE THESE PLANTS NOT BEEN ISSUED A NOTICE OF VIOLATION (NOV), AND WHY HAVE THEY NOT BEEN FINED?

ADDITIONALLY, THERE SHOULD NOT BE A ROLLING 30 DAY AVERAGE, SINCE THAT PROCEDURE WILL DAMPEN ANY PEAK EMISSION EVENTS OF THESE DANGEROUS AIR POLLUTANTS THAT RISE ABOVE THE REGULATORY LIMITS. THIS PROCESS EFFECTIVELY NEGATES THE 8 HOUR OZONE SMOG STANDARD AND THIS PROCESS WILL WIPE OUT VIOLATIONS OF THE CAA FEDERAL LAW, AFFECTING THE PUBLIC'S ABILITY TO MONITOR THE AIR POLLUTION THAT WE ARE EXPOSED TO EVERY DAY.

DISTURBINGLY, PADEP WISHES TO CODIFY INTO REGULATION THE BAD PRACTICE OF AVERAGING EMISSIONS OVER AN OWNER/OPERATORS MULTIPLE FACILITIES AND SOURCES ACROSS PA, AND ALSO WITHOUT REGARD TO WHETHER THE OTHER SOURCES ARE UPWIND OR DOWNWIND. THIS PRACTICE IS GUARANTEED TO CREATE "HOTSPOTTING" SOMEWHERE IN PA MULTIPLE TIMES, EXPOSING PEOPLE TO HIGH LEVELS OF POLLUTION IN AN ILLEGAL EVENT(S) WHICH INDUSTRY HOPES TO WIPE AWAY BY AVERAGING THAT TOXIC EVENT WITH ANOTHER SOURCES LOWER EMISSIONS HERE IN PA.

SEE THE SIERRA CLUB'S LETTER TO PADEP OF JANUARY 17, 2014.¹

THE PA ENVIRONMENTAL QUALITY BOARD (EQB) SHOULD NOT APPROVE THIS PROPOSED REGULATION.

WHY DO WE NEED A TRUE RACT PROPOSAL?

LOWER OZONE STANDARD: THE CASAC – THE CLEAN AIR SCIENCE ADVISORY COMMITTEE – OF EPA CONFIRMS THAT THERE WILL SOON BE FAR STRICTER OZONE CONTROLS: A MAXIMUM CEILING OF 70 PPB OZONE SMOG AND A FLOOR OF 60 PPB.

CASAC RECOMMENDATION TO EPA STAFF AS DESCRIBED IN MAY DRAFT LETTER AND FINAL APPROVED LETTER JUNE 2014: *"The CASAC concurs that 60 ppb is an appropriate and justifiable scientifically based lower bound for a revised primary standard. This is based upon findings of adverse effects, including clinically significant lung function decrements and airway inflammation, after exposures to 60 ppb ozone in healthy adults with moderate exertion (Adams 2006; Schelegle et al. 2009; Brown, 2008; Kim et al., 2011), with limited evidence of adverse effects below 60 ppb. The CASAC further notes that clinical studies do not address sensitive subgroups, such as children with asthma, and that there is a scientific basis to anticipate that the adverse effects for such subgroups are likely to be more significant at 60 ppb than for healthy adults.*

¹ Sierra Club legal staff Zach Fabish and Ryan Knapick to PADEP staff Randy Bordner and Robert Reilly, January 17, 2014 on proposed RACT rulemaking.

Furthermore, “controlled human exposure studies show respiratory symptoms combined with clinically significant lung function decrements following ozone exposures to 60 ppb to 70 ppb in healthy individuals. These findings suggest that ozone exposures of 70 ppb pose significant concern, especially for children, asthmatics, the elderly and other at risk populations. Eight-hour ozone exposures (in the form of the current standard) at levels less than 70 ppb have also been shown to be harmful to human health, although to a lower percent of the population and with overall less severity as compared to what would occur at 70 ppb. An alternative standard level of 65 ppb would reduce the frequency of occurrence of lung function decrements of 15% or higher, as compared to a level of 70 ppb, but does not eliminate such occurrences. Further, an alternative standard level of 65 ppb would lead to lower frequency of short-term and long-term premature mortality than the current standard or a level of 70 ppb. The frequency of lung function decrements and premature mortality decreases even further when the alternative standard is lowered to 60 ppb. As noted earlier, based on results for clinical studies of healthy adults, and scientific considerations of differences in responsiveness of asthmatic children compared to healthy adults, there is scientific support that 60 ppb is an appropriate exposure of concern for asthmatic children.

We need real, workable and enforceable RACT limits to help Pennsylvania meet this important health protection challenge.

OZONE WILL INCREASE WITH GLOBAL CLIMATE DISRUPTION:

THE MAY 2014 STUDY BY THE NATIONAL CENTER FOR ATMOSPHERIC RESEARCH FORECASTS THAT THERE WILL BE A SPIKE IN OZONE SMOG POLLUTION LEVELS BY 2050 ACROSS THE CONTINENTAL USA IF CURRENT EMISSIONS LEVELS OF OZONE PRECURSOR POLLUTANTS CONTINUE TO PERSIST AND ARE NOT REDUCED².

AMERICAN LUNG ASSOCIATION’S STATE OF THE AIR 2014 REPORT:

IN PENNSYLVANIA, ACCORDING TO SOTA 2014, PARTS OF OUR STATE RANKS 12TH, 16TH, AND 21ST IN MOST PEOPLE AT RISK FROM OZONE SMOG POLLUTION DURING THE PAST YEAR 2013-2014. AT RISK ARE 9,790,797 PEOPLE IN PENNSYLVANIA THAT ARE OVER 65 AND SUFFER FROM ADULT OR PEDIATRIC ASTHMA, HAVE COPD, OR CARDIOVASCULAR DISEASE.

THE SOTA 2014 REPORT ALSO IDENTIFIES CENTRE COUNTY AS RANKING A FAILING ‘F’ GRADE IN THE OCCURRENCE OF HIGH OZONE VIOLATION DAYS. CENTRE COUNTY RANKS 84TH FOR HIGH OZONE DAYS OUT OF 277 METROPOLITAN AREAS. CENTRE COUNTY IS CONSIDERED AS HAVING CLEAN AIR BY THE ‘WOMAN ON THE STREET’, AND THESE PEOPLE FIND IT SURPRISING THAT OUR POLLUTION IS SO HIGH.

CURRENT COUNTY POPULATION IS 155,171. CHILDHOOD ASTHMA IS 2,517, WHILE ADULT ASTHMA IS 13, 653 PEOPLE. 7,387 PEOPLE HAVE COPD; 9,336 PEOPLE HAVE CARDIOVASCULAR DISEASE; 10,539 PEOPLE HAVE DIAGNOSED DIABETES. THERE ARE 24,224 CHILDREN UNDER 18 YEARS, 18,452 ADULTS OVER 65 AND 26,792 PEOPLE IN CENTRE COUNTY LIVE IN POVERTY.

PA STATE ENERGY PROFILE 5/27/14:

THE CONTINUED INCREASE IN ENERGY PROVIDED FROM RENEWABLES WILL HELP TO CURB OUR LARGE ENERGY CONSUMPTION FROM FOSSIL FUELS AND PETROLEUM BASED PRODUCTS. TOTAL ENERGY CONSUMPTION FOR PA IN 2011 WAS 3,725 TRILLION BTU CONSUMED, RANKING PA 7TH IN THE NATION.³

PM HEALTH ANALYSIS:

² **Projections of Future Summertime Ozone over the U.S.** G. G. Pfister, S. Walters, J.-F. Lamarque, J. Fast, M. C. Barth, J. Wong, J. Done, G. Holland, C. L. Bruyère. ©2014 American Geophysical Union. All rights reserved. doi: 10.1002/2013JD020932

³ WWW.EIA.GOV/STATE/PA AS OF 5/27/14

WE HAVE KNOWN FOR A LONG TIME THAT OZONE SMOG PRECURSOR POLLUTANTS SUCH AS NITRATES AND SULFATES – SMALL PARTICULATE MATTER – HAVE DRASTIC HEALTH CONSEQUENCES. IN THE 2009 ENVIRONMENTAL HEALTH PERSPECTIVES PAPER BY ZANOBETTI AND SCHWARTZ⁴, IT WAS CONCLUDED THAT THERE IS AN INCREASED RISK OF MORTALITY FOR CARDIOVASCULAR DISEASE, MYOCARDIAL INFARCTION, STROKES AND RESPIRATORY DISEASE FROM SMALL FINE PARTICLES SOOT.

A VIABLE RACT REGULATION AND PROGRAM WILL HELP TO ALLEVIATE THIS KNOWN HUMAN HEALTH DANGER.

MONITORING IN CENTRE COUNTY

WHILE MONITORING NETWORKS IN PA CAPTURE SOME OF OUR AIR POLLUTION BURDEN, ESPECIALLY FOR URBAN MSA'S, RURAL PENNSYLVANIA IS ENDANGERED BY A SIGNIFICANT LACK OF AIR POLLUTION MONITORING. WHILE STATE COLLEGE, CENTRE COUNTY PA HAS SOME OZONE MONITORING, OUR COUNTY'S RURAL AREAS, SUCH AS PENNS VALLEY WHERE I LIVE, SPECIFICALLY LACKS ANY AIR POLLUTION MONITORING. OUR AIR POLLUTION BURDEN FROM NON COAL MINING IS VISIBLE THROUGHOUT OUR AREA FROM DUST LEAVING THE BOUNDARIES OF THE MINING SITE ILLEGALLY. IT SHOULD BE MONITORED FOR VISIBLE PLUMES LEAVING THE SITE, AND RECORD LEVELS OF PM 10 (COARSE PARTICULATE) AND PM2.5 (FINE PARTICLE SOOT) POLLUTION .

COORDINATION WITH OTHER CAA REQUIREMENTS :

THERE ARE SIGNIFICANT EMISSIONS IN RURAL PA'S CENTRE COUNTY FROM UNMONITORED STATIONARY SOURCES SUCH AS NON COAL MINING OPERATIONS. PRINCIPAL EMISSIONS FROM THESE MULTIPLE FACILITIES HERE IN PA ARE DUST, BOTH FINE PARTICLE SOOT PM 2.5 AND COARSE DUST PM10. TO PROTECT PUBLIC HEALTH, THESE STATIONARY EMISSIONS SOURCES MUST BE MONITORED, TAKEN INTO CONSIDERATION WHEN THE NEW DESIGN NUMBERS ARE CREATED FOR THE NEXT ROUND OF SIP IMPLEMENTATION FOR CENTRE COUNTY, THEN CONTROLLED AND ENFORCED.

THE ONLY POSSIBLE CONCLUSION IS THAT EQB MUST NOT APPROVE THIS FAILED ATTEMPT AT REGULATION AND IT MUST BE RETURNED TO PADEP TO BE RE-WRITTEN.

THANK YOU FOR THIS OPPORTUNITY TO COMMENT.

SINCERELY,

NANCY F PARKS

nfparks2@verizon.net

⁴ Zanobetti, Antonella and Joel Schwartz. *The Effect of Fine and Coarse Particulate Air Pollution on Mortality: A National Analysis*. ENVIRONMENTAL HEALTH PERSPECTIVES 117(6): JUNE 2009.

ENVIRONMENTAL QUALITY BOARD, ONE PAGE SUMMARY RACT RULEMAKING PROPOSAL

25 PA CODE CHAPTERS 121 AND 129

ADDITIONAL RACT REQUIREMENTS FOR MAJOR SOURCES OF NOX AND VOC'S

PA. BUL 44 (16). APRIL 19, 2014

1. **THIS PROPOSED REGULATION (PA. BUL. 44(16) APRIL 19, 2014) IS NOT RACT. IT DOES NOT ACCOMPLISH REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT), BUT MAINTAINS A STATUS QUO THAT DOES NOT MEET THE FEDERAL CLEAN AIR ACT TEST OF REDUCING AIR POLLUTION EMISSIONS FOR NITROGEN OXIDES AND VOC'S (VOLATILE ORGANIC CHEMICALS) "... AS EXPEDITIOUSLY AS PRACTICABLE".**
2. **CURRENT 93,000 TPY NOX EMITTED VERSUS PROPOSED ALLOWABLE OF 132,000 TPY NOX EMITTED FROM PA POWER PLANTS?**
3. **EPA WILL HAVE NO CHOICE BUT TO DISAPPROVE THIS PROPOSED REGULATION. PENNSYLVANIA WILL ALSO BE OPEN TO MISSING REGULATORY DEADLINES AND THE POSSIBILITY THAT EPA WILL ISSUE A FEDERAL IMPLEMENTATION PLAN IN THE FUTURE.**
4. **MANY OF THESE PROVISIONS DO NOT MEET THE CAA REQUIREMENT FOR A MONITORED, VERIFIABLE, MEASUREABLE AND FEDERALLY ENFORCEABLE EMISSIONS CONTROL**
5. **THE RACT LIMIT SHOULD BE 0.05 LBS/MMBTU NOX.**
6. **TURNING OFF POLLUTION CONTROL EQUIPMENT IS ILLEGAL AND UNACCEPTABLE. THIS USE OF SCR HAS BEEN ACCEPTED AS PART OF PENNSYLVANIA'S SIP. WHY HAVE THESE PLANTS NOT BEEN ISSUED A NOTICE OF VIOLATION (NOV)**
7. **THERE SHOULD NOT BE A ROLLING 30 DAY AVERAGE;**
8. **IT IS BAD PRACTICE TO AVERAGE EMISSIONS OVER AN OWNER/OPERATOR'S MULTIPLE FACILITIES AND SOURCES ACROSS PA, INCLUDING WITHOUT REGARD TO WHETHER THE OTHER SOURCES ARE UPWIND OR DOWNWIND. THIS PRACTICE IS GUARANTEED TO CREATE "HOTSPOTTING" SOMEWHERE IN PA MULTIPLE TIMES;**
9. **THERE WILL BE A SPIKE IN OZONE SMOG POLLUTION LEVELS BY 2050 ACROSS THE CONTINENTAL USA**
10. **SOTA 2014, PARTS OF OUR STATE RANKS 12TH, 16TH, AND 21ST IN MOST PEOPLE AT RISK FROM OZONE SMOG POLLUTION DURING THE PAST YEAR 2013-2014. AT RISK ARE 9,790,797 PEOPLE;**
11. **CENTRE COUNTY AS RANKING A FAILING' F' GRADE IN THE OCCURRENCE OF HIGH OZONE VIOLATION DAYS. CENTRE COUNTY RANKS 84TH FOR HIGH OZONE DAYS OUT OF 277 METROPOLITAN AREAS. CENTRE COUNTY IS CONSIDERED AS HAVING CLEAN AIR;**
12. **TOTAL ENERGY CONSUMPTION FOR PA IN 2011 WAS 3,725 TRILLION BTU CONSUMED, RANKING PA 7TH IN THE NATION;**
13. **OZONE SMOG PRECURSOR POLLUTANTS SUCH AS NITRATES AND SULFATES – SMALL PARTICULATE MATTER – HAVE DRASTIC HEALTH CONSEQUENCES. IN THE 2009 ENVIRONMENTAL HEALTH PERSPECTIVES PAPER BY ZANOBETTI AND SCHWARTZ⁵, IT WAS CONCLUDED THAT THERE IS AN INCREASED RISK OF MORTALITY FOR CARDIOVASCULAR DISEASE, MYOCARDIAL INFARCTION, STROKES AND RESPIRATORY DISEASE FROM SMALL FINE PARTICLES SOOT;**
14. **RURAL PENNSYLVANIA IS ENDANGERED BY A SIGNIFICANT LACK OF AIR POLLUTION MONITORING;**
15. **IN PENNS VALLEY, CENTRE COUNTY, THE BURDEN FROM NON COAL MINING IS VISIBLE THROUGHOUT OUR AREA FROM DUST LEAVING THE BOUNDARIES OF THE MINING SITE ILLEGALLY. IT SHOULD BE MONITORED FOR VISIBLE PLUMES LEAVING THE SITE, AND RECORD LEVELS OF PM 10 (COARSE PARTICULATE) AND PM2.5 (FINE PARTICLE SOOT) POLLUTION;**
16. **THE ONLY POSSIBLE CONCLUSION IS THAT EQB MUST NOT APPROVE THIS FAILED ATTEMPT AT REGULATION AND IT MUST BE RETURNED TO PADEP TO BE RE-WRITTEN.**

THANK YOU.

⁵ Zanobetti, Antonella and Joel Schwartz. *The Effect of Fine and Coarse Particulate Air Pollution on Mortality: A National Analysis.* ENVIRONMENTAL HEALTH PERSPECTIVES 117(6): JUNE 2009.

ENVIRONMENTAL QUALITY BOARD, ONE PAGE SUMMARY RACT RULEMAKING PROPOSAL

25 PA CODE CHAPTERS 121 AND 129

ADDITIONAL RACT REQUIREMENTS FOR MAJOR SOURCES OF NOX AND VOC'S

PA. BUL 44 (16). APRIL 19, 2014

1. **THIS PROPOSED REGULATION (PA. BUL. 44(16) APRIL 19, 2014) IS NOT RACT.** IT DOES NOT ACCOMPLISH REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT), BUT MAINTAINS A STATUS QUO THAT DOES NOT MEET THE FEDERAL CLEAN AIR ACT TEST OF REDUCING AIR POLLUTION EMISSIONS FOR NITROGEN OXIDES AND VOC'S (VOLATILE ORGANIC CHEMICALS) "... AS EXPEDITIOUSLY AS PRACTICABLE".
2. **CURRENT 93,000 TPY NOX EMITTED VERSUS PROPOSED ALLOWABLE OF 132,000 TPY NOX EMITTED FROM PA POWER PLANTS?**
3. **EPA WILL HAVE NO CHOICE BUT TO DISAPPROVE THIS PROPOSED REGULATION.** PENNSYLVANIA WILL ALSO BE OPEN TO MISSING REGULATORY DEADLINES AND THE POSSIBILITY THAT EPA WILL ISSUE A FEDERAL IMPLEMENTATION PLAN IN THE FUTURE.
4. **MANY OF THESE PROVISIONS DO NOT MEET THE CAA REQUIREMENT FOR A MONITORED, VERIFIABLE, MEASUREABLE AND FEDERALLY ENFORCEABLE EMISSIONS CONTROL**
5. **THE RACT LIMIT SHOULD BE 0.05 LBS/MMBTU NOX.**
6. **TURNING OFF POLLUTION CONTROL EQUIPMENT IS ILLEGAL AND UNACCEPTABLE.** THIS USE OF SCR HAS BEEN ACCEPTED AS PART OF PENNSYLVANIA'S SIP. **WHY HAVE THESE PLANTS NOT BEEN ISSUED A NOTICE OF VIOLATION (NOV)**
7. **THERE SHOULD NOT BE A ROLLING 30 DAY AVERAGE;**
8. **IT IS BAD PRACTICE TO AVERAGE EMISSIONS OVER AN OWNER/OPERATOR'S MULTIPLE FACILITIES AND SOURCES ACROSS PA, INCLUDING WITHOUT REGARD TO WHETHER THE OTHER SOURCES ARE UPWIND OR DOWNWIND. THIS PRACTICE IS GUARANTEED TO CREATE "HOTSPOTTING" SOMEWHERE IN PA MULTIPLE TIMES;**
9. **THERE WILL BE A SPIKE IN OZONE SMOG POLLUTION LEVELS BY 2050 ACROSS THE CONTINENTAL USA**
10. **SOTA 2014, PARTS OF OUR STATE RANKS 12TH, 16TH, AND 21ST IN MOST PEOPLE AT RISK FROM OZONE SMOG POLLUTION DURING THE PAST YEAR 2013-2014. AT RISK ARE 9,790,797 PEOPLE;**
11. **CENTRE COUNTY AS RANKING A FAILING' F' GRADE IN THE OCCURRENCE OF HIGH OZONE VIOLATION DAYS. CENTRE COUNTY RANKS 84TH FOR HIGH OZONE DAYS OUT OF 277 METROPOLITAN AREAS. CENTRE COUNTY IS CONSIDERED AS HAVING CLEAN AIR;**
12. **TOTAL ENERGY CONSUMPTION FOR PA IN 2011 WAS 3,725 TRILLION BTU CONSUMED, RANKING PA 7TH IN THE NATION;**
13. **OZONE SMOG PRECURSOR POLLUTANTS SUCH AS NITRATES AND SULFATES – SMALL PARTICULATE MATTER – HAVE DRASTIC HEALTH CONSEQUENCES. IN THE 2009 ENVIRONMENTAL HEALTH PERSPECTIVES PAPER BY ZANOBETTI AND SCHWARTZ¹, IT WAS CONCLUDED THAT THERE IS AN INCREASED RISK OF MORTALITY FOR CARDIOVASCULAR DISEASE, MYOCARDIAL INFARCTION, STROKES AND RESPIRATORY DISEASE FROM SMALL FINE PARTICLES SOOT;**
14. **RURAL PENNSYLVANIA IS ENDANGERED BY A SIGNIFICANT LACK OF AIR POLLUTION MONITORING;**
15. **IN PENNS VALLEY, CENTRE COUNTY, THE BURDEN FROM NON COAL MINING IS VISIBLE THROUGHOUT OUR AREA FROM DUST LEAVING THE BOUNDARIES OF THE MINING SITE ILLEGALLY. IT SHOULD BE MONITORED FOR VISIBLE PLUMES LEAVING THE SITE, AND RECORD LEVELS OF PM 10 (COARSE PARTICULATE) AND PM2.5 (FINE PARTICLE SOOT) POLLUTION;**
16. **THE ONLY POSSIBLE CONCLUSION IS THAT EQB MUST NOT APPROVE THIS FAILED ATTEMPT AT REGULATION AND IT MUST BE RETURNED TO PADEP TO BE RE-WRITTEN.**

THANK YOU.

¹ Zanobetti, Antonella and Joel Schwartz. *The Effect of Fine and Coarse Particulate Air Pollution on Mortality: A National Analysis.* ENVIRONMENTAL HEALTH PERSPECTIVES 117(6): JUNE 2009.