



Stephen Hoffman

From: ecomment@pa.gov
Sent: Friday, January 8, 2021 2:55 PM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; siversen@pahouse.net
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: CO2 Budget Trading Program (#7-559).

Commenter Information:

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Comments entered:

201 West Aaron Square December 10, 2020
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Virtual and Written Testimony to the Environmental Quality Board and Pennsylvania Department of Environmental Protection/ Bureau of Air Quality on Chapter 145: the Interstate Pollution Transport Reduction, Executive Order 2019-1 Subchapter E. CO2 Budget Trading program

I am Nancy F. Parks, a resident of Aaronsburg Village in Haines Township, Centre County. I am testifying as a private citizen. Thank you for this opportunity to speak to ideas, concepts and my concerns surrounding reducing carbon air pollution in Pennsylvania. I will submit these comments of December 10th plus additional ideas and technical comments by mid- January to eComments PADEP electronic site. A year ago, Science News reported on new scientific findings that measured greenhouse gas methane – for which we have abundant sources in Pennsylvania – and emitted from fossil fuel sources to be 25 percent to 40 percent higher than the industry voluntarily reported. Reducing greenhouse gas emissions is the most urgent problem Pennsylvania faces at this time. Therefore, I support Pennsylvania joining the regional carbon emissions cap of the Regional Greenhouse Gas Initiative (RGGI) of the Northeast and Mid-Atlantic states, with strict and

enforceable goals. We do this by achieving zero carbon emissions by no later than 2050, and more reasonably by 2030 while at the same time supporting the creation of 100% renewable energy here in Pennsylvania by 2050, going beyond Governor Wolf's Executive Order 2019-1 which required an 80% carbon reduction by 2050.

Zero percent carbon emissions is a necessity for meeting and reducing the natural resource and social challenges brought about by the effects of Climate Disruption here in Pennsylvania.

RGGI is one effective tool in a larger toolbox. There will certainly be a necessity for increasing the carbon reductions beyond RGGI.

NEW CARBON EMISSIONS

That said, my first concern is that my research has shown that Beaver County western Pennsylvania's ethane cracker facility now under construction with a combined plan approval and operating permit and which was 70% completed in September 2020, with a startup operation expected in 2021. This facility is expected to increase carbon emissions in Pennsylvania by 2.25 MMTCO₂e (million tons of carbon equivalent) annually. These hugely significant expected carbon emissions that will be spewed annually do not appear to have been included in calculations for balancing our need to reduce carbon emissions versus the quantity of carbon allowances that will be available for business polluter use through the RGGI carbon allowance auction. RGGI's required reductions for Pennsylvania will be 30% in 2022, then 3% CO₂ reductions for every year thereafter. This ethane cracker's emissions would require that 6 entire PA counties would need to be re-forested to balance these annual emissions. That is 2 Million acres of land.

My second concern is with the proposed natural gas power plant for Renovo PA. The current proposal indicates that we could expect 5 MMTCO₂e emitted annually if a plan approval for construction and an operating permit are approved and issued for two power blocks at Renovo. I see no indication that these two facilities with multiple sources have been included in the most recent greenhouse gas inventory submitted to PADEP/BAQ, which are the basis for RGGI reductions. Therefore these two new facilities alone will significantly erode your carbon reductions and its benefit from RGGI. PADEP/BAQ must not issue an operating permit for the Beaver County ethane cracker and must not issue a plan approval nor an operating permit for Renovo, PA. Renewable energy methods and processes should be encouraged for Renovo, PA for electricity generation.

The use of renewable energy is necessary for the protection of the public health from air pollution exposures and it is critical to Pennsylvania meeting its urgent carbon reduction goals. The cracking of natural gas production byproduct ethane into ethylene for virgin plastic production here in PA must not occur. We have sufficient substitutions for virgin plastics and recycled plastic based consumer goods which can meet all our cultural and consumer needs. The Beaver County ethane cracker and any proposed electricity generation in Renovo using outdated natural gas will stymie the RGGI and the renewable energy markets. It is time for Pennsylvania to embrace solar, wind and other renewable energy processes for new clean manufacturing and electricity generation consumers. We have proven technologies for community solar which can provide the town of Renovo with electricity generation that will also protect public health and local natural resources.

EPA Interference

Has PADEP/BAQ determined if the newest bad idea from the current EPA – i.e. a recently proposed final rule on EPA ignoring the secondary benefits from air pollution reductions – affect the final form that this proposed RGGI regulation?

Additions/Solutions for RGGI Implementation

1. It is urgent that Pennsylvania increase the effectiveness of PA's AEPS (alternative energy portfolio standard) from its current 18% renewables by 2021 to quickly expand that program to at least 50% renewables by 2030 and 100% renewables by 2050;
2. Bonding costs to industry owners of both existing and new – both conventional and

unconventional - natural gas production wells, recovery and distribution facilities must be significantly increased to fully cover the costs of the horrendous damage that these facilities inevitably create;

3. Directly regulate methane – both existing and new emissions and leakages – to at least as stringent a regulation as was created for new methane sources, if not more;

4. Stricter controls on conventional and unconventional natural gas permits for leakage inspection and enforcement;

5. No flaring of methane ever; ban methane flaring everywhere in Pennsylvania;

6. No operating permit for the Beaver county ethane cracker;

7. No plan approval and no operating permit for a Renovo town electricity generation facility;

8. Institute a community solar electricity generation program for Renovo, PA;

9. Institute energy efficiency and energy conservation programs in Renovo;

10. Change Pennsylvania's fleet procurement to all electric vehicles;

11. Use RGGI auction funds to distribute monies to PA municipalities for electric bus fleets;

12. There should be a 'Renewable Energy Acceleration' set aside to provide monies for smaller municipalities to change local existing fleets & bus systems to all EV;

13. If set asides are not used for renewable energy installations, then that set aside should retire its carbon allowances;

14. Retire set aside allowances at the conclusion of each year;

15. Create a set-aside for low income ratepayers;

16. Allow direct ratepayer bill assistance;

17. Use RGGI auction monies coming into Pennsylvania in 2022 and thereafter for environmental justice and environmental equity projects for low income households and minority PA communities;

a. E.g. southwestern Pennsylvania baseline health studies of fracking effects;

b. Surveying and repairing SW PA fracking damaged communities including safe drinking water systems;

c. Community solar or renewable energy electricity generation for Renovo and other PA towns;

d. The closure of multiple cumulative air pollution sources in Chester city, Chester county PA and elsewhere in PA where this is current problem.

Thank You and Happy New Year to all my friends at AQTAC!

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Submitted by Nancy F Parks on January 8, 2021 to eComments

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These links provide access to the attachments provided as part of this comment.

Comments Attachment: [RGGI Dec 10 2020 eComments to EQB.docx](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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