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Form Letter A 41

Chapter 78 PA DEP Contact
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Please do not adopt the proposed plan for "Additional Reasonable Available Control Technology Requirements for Major Sources of NOx and VOCs." This rule will actually weaken life-saving emissions limits. Without the lax policy being proposed, PA already had 485 ozone days in the state in 2013. Pennsylvania cannot handle the increase of ground level ozone that will be created by increases in ozone precursors which will be the result of this rule.

It is highly irresponsible to allow utilities to average their NOx emissions over their entire fleet of power plants in addition to allowing them to average these emissions over 30 days rather than the 1 or 8-hour standards. Lungs cannot average emissions and can be severely damaged after only being exposed to ground-level ozone for a short time. NOx emissions should be monitored by pollution source and over a 1-hour and 8-hour standard.

Most power plants in Pennsylvania already have an effective, modern pollution-control technology known as selective catalytic reduction. However, under PA DEP's proposed rule, power plants will be allowed to use older, less efficient and less effective technologies to control their emissions. If Pennsylvania does not require the most effective technology to control NOx, the ozone problem will only get worse and public health will suffer. Please require operators of coal-fired boilers to use selective catalytic reduction to minimize NOx pollution, protect Pennsylvania's air quality, and minimize dangerous ozone days.

Thank You,

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