

August 6, 2025

U.S. Environmental Protection Agency
EPA Docket Center, Docket ID No. EPA-HQ-OAR-2025-0124
Mail code: 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention: Docket No. EPA-HQ-OAR-2025-0124

Re: Proposed Rulemaking: Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units. 90 FR 25752 (June 17, 2025)

The Pennsylvania Department of Environmental Protection (PADEP) provides the following comments regarding the United States Environmental Protection Agency's (EPA) June 17, 2025 proposed repeal of the New Source Performance Standards (NSPS) at 40 CFR Part 60, Subpart TTTT and the Greenhouse Gas Emissions Standards (EG) at 40 CFR Part 60, Subparts TTTTa and UUUUb for Fossil Fuel-Fired Electric Generating Units (EGUs) (90 FR 25752).

First, PADEP disagrees with EPA's proposed finding (see 90 FR 25752, 25768) that GHG emissions from fossil fuel-fired EGUs do not contribute significantly to dangerous air pollution. PADEP agrees with the EPA's conclusions in the agency's 2009 "Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act," specifically that GHG emissions in the atmosphere may reasonably be anticipated to endanger the public health and to endanger the public welfare because GHG emissions contribute to climate change. 74 FR 66496, 66497 (December 15, 2009). As noted by EPA, the electric power sector contributed the second most GHG emissions by economic sector in 2022.¹

Second, the Proposed Repeal must address the effects of climate change and associated costs. Pennsylvania is facing numerous harms related to climate change, as detailed in the 2024 report entitled "Pennsylvania Climate Impacts Assessment 2024."² Some of the adverse impacts highlighted in the 2024 report included: more frequent and intense extreme heat events, more frequent extreme rainfall events, and more coastal flooding. These impacts, among others, are expected to harm the Commonwealth's natural resources and infrastructure, as well as the health

¹ <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>

² See generally, Pa. Dep't. of Env't. Protect., et al., *Pennsylvania Climate Impacts Assessment 2024* (April 2025), [greenport.pa.gov/elibrary/GetDocument?docId=9587655&DocName=PA CLIMATE IMPACTS ASSESSMENT 2024.PDF](https://greenport.pa.gov/elibrary/GetDocument?docId=9587655&DocName=PA%20CLIMATE%20IMPACTS%20ASSESSMENT%202024.PDF) <2Fspan> <2Fspan>

of its residents. Economic impacts include up to 135 billion dollars annually for power interruptions³ and an estimated 686 million dollars to replace homes at risk due to sea level rise.⁴

Regarding infrastructure impacts, the 2024 report noted that the Commonwealth is facing potential catastrophic impacts from landslides due to greater frequency and intensity of heavy precipitation events, and that energy and transportation systems infrastructure, especially in Southwestern Pennsylvania, “may be particularly vulnerable.”⁵ Specifically, nearly 50 percent of miles of electric transmission lines and natural gas pipelines and 41 percent of electric substations are located in landslide hazard zones.⁶

Another such cost to this will be the increase in costs associated with damages to infrastructure owned and maintained by the Commonwealth as a result of more frequent extreme storm events associated with climate change. In 2018 alone, the Pennsylvania Department of Transportation spent approximately 127 million dollars fixing damage from flooding and landslides.⁷

The Commonwealth anticipates an increase in medical costs that are borne in large part by the Commonwealth through its Medicaid and Childhood Health Insurance Programs as a result of the Proposed Repeal. Asthma cases and episodes place a significant economic burden on Pennsylvania, with at least 750,000 Pennsylvanians being treated for asthma, resulting in a total direct and indirect cost of approximately 4.3 billion dollars annually.⁸ Approximately 3,087,000 Pennsylvanians are on Medicaid and CHIP enrollment; these programs bear expenses associated with asthma-related hospitalizations and other medical costs in the Commonwealth.⁹

PADEP expects that there will be reductions in GHG emissions from the implementation of the GHG emission standards that are the subject of the EPA’s Proposed Repeal. Newly constructed stationary combustion turbines currently subject to 40 CFR Subparts TTTT and TTTTa in Pennsylvania are meeting the respective carbon dioxide (CO₂) emission standards. Relevant to the EPA’s GHG EGU Rule, the Pennsylvania 2024 Priority Climate Action Plan (PCAP) identifies approaches the Commonwealth is considering, including Priority GHG Reduction Measures for the industrial and power sectors. These approaches include the utilization of Carbon Capture, Use and Storage (CCUS) and Net-Zero Electricity Grid measures.¹⁰ The PA

³ *Id.* at 73.

⁴ *Id.* at 142.

⁵ *Id.* at 134.

⁶ *Id.* at 134.

⁷ *Id.* at 133.

⁸ Ctr. for Disease Control and Prevention. (2024, September 17). Asthma Cost Calculator: Asthma Cost By State, accessed July 9, 2025, www.cdc.gov/national-asthma-control-program/php/cost-calculator/index.html

⁹ U.S. Dep’t. of Health and Human Servs., Medicaid.gov, March 2025 Medicaid & CHIP Enrollment Data Highlights, available at: <https://www.medicaid.gov/medicaid/program-information/medicaid-and-chip-enrollment-data/report-highlights/index.html>

¹⁰ Pa. Dep’t. of Env’t. Prot., *Pennsylvania’s Priority Climate Action Plan* (March 1, 2024) at 27, greenport.pa.gov/elibrary/GetDocument?docId=8188822&DocName=PA_PRIORITY

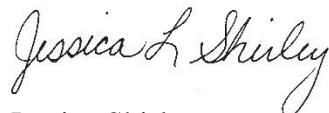
DEP expects that the EPA’s proposed repeal would result in backsliding on air quality improvements.

The CCUS measure aims to reduce GHG emissions through point source CCUS and natural land-based storage and sequestration efforts. Section 4.5.4 of the 2024 PCAP explains that CCUS in Pennsylvania can take many forms including: (1) Installing point source capture on existing or new industrial facilities. (3) Developing new geological storage facilities. (3) Using clean energy financing tools to expand point source capture, geological storage, or natural land management strategies and (4) Encouraging and providing incentives for point source capture, geological storage, or natural land-management strategies.¹¹ Section 4.5.4 of the PCAP provides that in the power sector, CCUS can provide a means for fossil-fueled plants to continue operating while substantially lowering their GHG emissions.¹²

In conclusion, the repeal of the GHG emission standards from fossil fuel-fired power plants would be contrary to Pennsylvania’s interest in reducing GHG emissions to mitigate the impacts of climate change.

DEP appreciates the opportunity to provide comments on the EPA’s proposal to repeal of the NSPS and EG Greenhouse Gas Emissions Standards for Fossil Fuel-Fired EGUs. Should you have questions or need additional information, please contact Nick Lazor, Director of the Bureau of Air Quality, by e-mail at nlazor@pa.gov.

Sincerely,



Jessica Shirley
Secretary

[CLIMATE ACTION PLAN.PDF](#) [%28NEW%29](#)

¹¹ *Id.* at 39.

¹² *Id.* at 12.