



Clean Air Board of Central Pennsylvania:
A Faith-based Group of Concerned Citizens

528 Garland Drive, Carlisle, PA 17013

Comments of the Clean Air Board, May 20, 2015

JUSTINA WASICEK

I am here today on behalf of the Clean Air Board of Central Pennsylvania, 528 Garland Drive, Carlisle, PA.

It is surprising to find out how dirty our air is in PA. The American Lung Association did a survey of 220 metropolitan areas around the United States. In 2015, they found that Pittsburgh is the 21st dirtiest area in the country for ozone pollution.

Philadelphia ranks as the 28th dirtiest area for smog.

The Lehigh Valley, part of the NY area, comes in at 11th dirtiest nationwide.

Lancaster is 41st dirtiest in the country.

And right where we are sitting, our area, which seems so small- town, ranks as 64th dirtiest in the United States for ozone pollution.

It matters what steps we take to control emissions from coal-burning plants.

Summer will soon be here and that can mean high levels of pollutants in our air, particularly ozone, which is commonly known as smog. Meteorologists declare "Air Quality Action" days when they project that weather conditions are conducive for unhealthy air pollution. In 2012, Department of Environmental Protection (DEP) called 11 "action days" for the Susquehanna Valley due to high concentrations of ozone. In 2013, DEP called 4 action days in the Susquehanna Valley due to ozone.

We should heed those warnings. Short term symptoms resulting from breathing high levels of ozone include chest pain, coughing, nausea, throat irritation, and congestion. These pollutants also aggravate bronchitis, heart disease, emphysema, and asthma—and they can increase the risk of stroke. Children, senior citizens, and those with asthma or other respiratory problems are urged to limit outdoor activities during action days. However, the response to our air quality

problems should not be to require people to take shelter indoors. The solution to pollution should be to clean it up.

Air Quality Action days are often declared when there is little wind and when the amount of ozone in stagnant air is projected to exceed federal health standards. Smog is caused when chemicals, including nitrogen oxides, react in sunlight, forming ground-level ozone.

Coal-fired power plants are the single largest source of smog-causing pollutants in Pennsylvania. While nearly all of the state's largest coal plants have the technology to reduce nitrogen oxides, many do not use the available technology. The Clean Air Act requires that existing sources of emissions which contribute to the ozone problem must install reasonably available control technology. Reasonably available control technology (RACT) is supposed to set a baseline of emission control for a particular category of emitting source. Accordingly, RACT determinations must set limits as rigorous as could be met through use of feasible control technology.

This proposed regulation does not impose uniform RACT requirements for Pennsylvania coal plants. Most of Pennsylvania coal plants have effective NOx emission controls installed, such as Selective Catalytic Reduction ("SCR") and low NOx burners. However, as originally proposed last year, the RACT NOx emission limit for a coal-fired boiler would be an extremely permissive range, which allows at least one coal plant to not use controls at all. As currently proposed, the emission limits would allow the Brunner Island coal plant to avoid the installation of SCR. This needs to be corrected. Please advise DEP to change the proposed regulations to require the Brunner Island coal-powered plant to install and use SCR.