

**Testimony of Mollie Simon, Outreach Coordinator with Clean Air Council**

**Proposed NOx RACT Standards, Before the Citizens Advisory Council**

**May 20<sup>th</sup>, 2015**

---

Good morning. My name is Mollie Simon and I am the Outreach Coordinator for the Clean Air Council. Clean Air Council is a non-profit environmental health organization headquartered in Philadelphia. The Clean Air Council is supportive of the proposed "Additional RACT Requirements for Major Sources of NOx and VOCs" but believes that this proposal needs to be strengthened by closing the loophole that exempts the Brunner Island coal-fired power plant.

The facility at Brunner Island is the only remaining large power plant that lacks the modern pollution controls, SCR (Selective Catalytic Reduction). As it stands, the Department of Environmental Protection's proposed rules would not require any reductions from coal-fired power plants without SCR technology or circulating fluidized bed boilers. The Brunner Island power plant is the only coal-fired power plant that falls in this category. Because of this exemption, the Brunner Island plant will continue to emit smog-creating pollution into the southeastern Pennsylvania air, an area which already has some of the worst smog pollution in the state.

The Brunner Island plant is the largest emitter of NOx pollution in the southeastern Pennsylvania region. While all other large coal unites in Pennsylvania have applied SCR technology, Brunner Island has lagged behind. Exempting the plant from RACT proposal would send a dangerous message that if industry drags their feet on common sense pollution controls, they will become a grandfathered exemption.

This issue is a major concern for our many members living downwind of this major polluter. The American Lung Association just gave York County Pennsylvania, home to the Brunner Island plant, an F grade for ozone pollution in the county. Ground-level ozone and smog pollution blankets our major urban areas, causing high levels of asthma, cancer, respiratory illness, and cardiac complications. Furthermore, these negative impacts are found to be more damaging to the most vulnerable in our communities - children, the elderly and those with a predisposition to lung and heart disease.

The Clean Air Council urges the Citizens Advisory Council to recommend to the Environmental Quality Board that this dangerous loophole be closed and that the Brunner Island coal-fired power plant is held to the same pollution standards as its competitors. The Clean Air Council is supportive of the RACT rule but believes that closing this loophole is critical to protecting the clean air and public health of citizens across southeastern Pennsylvania. The people of Pennsylvania have the right to breathe clean air. Thank you for your time.