



GROUP AGAINST SMOG & POLLUTION
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Testimony of Jamin Bogi
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To the U.S. Environmental Protection Agency
On EPA Docket # EPA-HQ-OAR-2009-0491
Federal Implementation Plans to Reduce Interstate
Transport of Fine Particulate Matter and Ozone

Philadelphia, Pennsylvania

August 26, 2010

Good afternoon. My name is Jamin Bogi and I am the Education and Outreach Coordinator for Group Against Smog and Pollution, or GASP. Thank you for taking comments today on this important proposal. While my colleague, Joe Osborne, has provided GASP's views on more technical aspects of the proposal, allow me to give you a boots-on-the-ground view.

Much of my work focuses on educating citizens of southwestern PA about our poor air quality and its effect on our health. Almost no one I meet knows or cares what NAAQS, BACT, BART, or VOC means. There is a strong feeling held by many in the region that because we don't have to leave streetlights on all day to cut through the smog like we did decades ago, the air is clean and our problems are gone. Unfortunately, the Pittsburgh region still has dirty air. PM2.5 is too small to be seen, which makes my job that much harder.

We face another obstacle to change in my region, which is that much of our pollution comes from elsewhere. Due to Pittsburgh's location, east of many coal-fired power plants, and its unique topography, lots of air pollution finds its way to Pittsburgh from somewhere else. Those who are aware of our air quality issues can be lulled into inaction because of this. Business leaders complain that stronger, local regulations we advocate for will make our area less competitive for business while not solving the pollution problem, since so much of it comes from upwind. Politicians see little reason to offend industry or labor when our problems can be blamed on others. This blame game means that our own large sources of pollution can go on polluting, without feeling much pressure to change.

GASP agrees—it's not fair that we have to breathe in the particulate matter and ozone produced several states away. We applaud EPA for taking interstate action for an interstate problem. Knowing that our upwind pollution sources are being dealt with will allow GASP to hold our leaders in southwestern Pennsylvania more accountable for the pollution we produce ourselves. The estimated annual health and welfare benefits of hundreds of billions of dollars are massive compared to the relatively puny costs of less than three billion dollars. The rule is estimated to prevent 23,000 non-fatal heart attacks in 2014, and many of those heart attacks would have occurred in the Pittsburgh region. Heart attacks like the one my father suffered. He grew up in McKeesport, a town on the Monongahela River a few miles east of Pittsburgh. At age 34, my age now, he suffered a heart attack and underwent a triple bypass. I speak for him as well when I say this action is appreciated.

But while we are pleased to see this rule go forward, we would like it to be even stronger. Pittsburgh stands out for many reasons. It's the City of Bridges, boasting more spans than even Venice. It's home to sports teams that win championships year after year. But even after this rule takes effect, it will still be called The Smoky City. Allegheny County, home of Pittsburgh, will be one of the last holdouts for having a monitor in violation of PM2.5 standards, so Allegheny County has the most to gain from the strongest possible regulations. CAMx modeling, which EPA admits is more accurate, shows that higher cost thresholds are needed for many regions to meet attainment for the 24-hour PM2.5 standard. GASP supports raising the cost threshold from \$2000/ton to at least \$2400/ton for SO₂, providing further reductions of hundreds of thousands of tons of pollutants per year. We also support moving all states expected to have attainment issues under CAMx modeling from group two to group one, and adding Texas to group two. It makes little sense to have more accurate data from CAMx modeling but not to use it. Again, thank you for taking this action and comments on it, and for proposing further action down the road.