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Testimony on Proposed Rulemaking
Additional RACT Requirements for Major Sources of NO_x and VOCs
25 PA Code Chapters 121 AND 129
5/27/2014

Good afternoon. My name is Jamin Bogi. I live at 2702 Burham Street, Pittsburgh, PA, 15203. I represent the Group Against Smog and Pollution, or GASP. GASP has worked to improve air quality in Southwestern Pennsylvania since 1969. Today I am asking you to require coal-fired power plants in Pennsylvania to use control technologies that many have already installed.

GASP works on reducing air pollution in many ways. We work with athletes and school children on ways to reduce their exposure to air pollution. We evaluate air permits to make sure all local, state, and federal laws are being adhered to. We support efforts taken by companies, universities, and others that voluntarily reduce energy usage and emissions. We've achieved significant reductions in local contributions to our air pollution problems. I have to wonder, though, if much of our recent work will be wiped out by this proposal. Will all of the reductions achieved elsewhere be wasted by allowing these weak limits?

To quote directly from the proposal: "for areas that exceed the NAAQS for ozone, states shall develop and implement a program that mandates that certain major stationary sources develop and implement a RACT program. RACT is defined as the lowest emissions limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility." Many coal-fired power plants in PA and beyond already use Selective Catalytic Reduction (SCR) units to control emissions, which strongly suggests that this technology is reasonably available, technologically feasible, and economically feasible. The process was first patented in the late 1950s. Even diesel vehicle manufacturers have begun using SCR technology to reduce emissions in large diesel vehicles. In some cases, use of SCR at coal-fired power plants would reduce NO_x emissions by almost an entire order of magnitude compared to the proposed regulations. This proposal, however, seems to ignore SCR. Emission limits must be changed to match the fact that SCR is reasonably available and in fact already in place at most coal-fired power plants in Pennsylvania.

The Pittsburgh region already struggles to meet the federal, health-based ambient air quality standard for ozone. It's widely expected that this ozone standard will soon be lowered again, as the current limit is already known to not be protective of public health. Predicted climate trends will lead to more ozone formation, as heat is a driver of ozone creation. And recent studies highlight the relatively newly-discovered link between ozone and premature death from cardiovascular disease, a link that is sure to see much more research and attention and will contribute to future tightening of air pollution limits.

Please, set NO_x and VOC limits that are in line with existing, available, feasible technology—limits that better protect public health. Thank you.