

Clean Power Plan

November 9, 2015

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SECRETARY'S OFFICE

NOV 17 2015

Secretary John Quigley
Pennsylvania Department of Environmental Protection
Policy Office
Rachel Carson State Office Building
PO Box 2063
Harrisburg, PA 17105-2063

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Dear Secretary ~~Quigley~~, 

I regret that I could not attend the November 4, 2015 Listening Session in Williamsport on the Clean Power Plan. I suspect that you would not want me coughing and sneezing around yourself and the various participants.

I have included here my 'narrative' as testimony that I developed for the Listening Session. I have also sent these along to the PADEP *eComments* system, along with my more extensive technical comments.

The reason I do this now is that during the public listening session, I had wanted to invite you to our very pleasant Penns Valley to see for yourself the quality of our soils and farms, the importance of preserving crop lands for the future, how much particulate air pollution is produced on agricultural lands and how much particulate matter fine soot is emitted and breathable from our local quarry. In particular, a local business Bierly Heating & Cooling would be able to describe for you how important the renewable energy rebates were to their business in installing residential solar in Centre County just a few years ago. That significant part of their business dried up immediately after the rebates were used up and never renewed by the General Assembly.

I hope that Penns Valley citizens can host you in 2016, and enhance the possibilities for focusing on and enhancing the use of renewable energy programs and rebates in Pennsylvania.

A July 2015 article in *Weather, Climate and Society* describes that curbing climate carbon emissions could save U.S. farms \$2.2 billion annually by the year 2100. Currently, total drought damages to agriculture in the U.S. are \$6-8 billion annually on average¹.

I commend you and the Wolf administration for your dedication to public participation in this first phase of the implementation process of the federal Clean Power Plan. I know that there will be more opportunities in the future.

Regards,

Nancy F Parks



¹ *Carbon cuts could save U.S. farmers billions of dollars.* Thomas Sumner. Science News. September 19, 2015.

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November 2, 2015

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Testimony on the Pennsylvania Implementation of the Federal Clean Power Plan for Carbon/CO2 Pollution Reduction

**14th PADEP Listening Session at Penn College, Lycoming County
November 4, 2015**

My name is Nancy F Parks and I live in a small agricultural village of Aaronsburg in central Pennsylvania. Our population is 1500 plus, and our agricultural valley – part of the Penns Creek watershed of Centre County – is an exceptional natural and organic agricultural resource area.

BEYOND THE CLEAN POWER PLAN

New information recently published means that *we need to look beyond just existing electric generators to the agricultural community for carbon reductions*. Before I proceed to speak to the federal Clean Power Plan, I will mention that the agricultural category is worthy of examination for permanent carbon reductions.

Perhaps this additional focus *should be a regulatory effort by PADEP*.

A new health study - released in the peer-reviewed journal *Nature*² in September 2015 and reported in the print press - describes air pollution as being responsible for 6% - i.e. 3.3 million – premature deaths globally every year. *This study found farming to play a larger role than expected in these premature deaths attributable to carbon and its role in the formation of inhalable particulate matter emissions*. Along with transportation, traffic and electric generation by existing power plants as leading sources for particulate matter and climate carbon, the ammonia source from farming coupled with local & long range transported

² Lelieveld, Los. *Nature*. September 16, 2015.

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emissions from these large sources brings into focus agricultural carbon and carbon dioxide as a human health hazard across our state.

Just the year before, the scientific community announced³ their identification of links between indoor and outdoor air pollution and traffic exposures; exposures usually associated with urban or higher population areas. *Now we have the first published identification of unregulated agricultural emissions in rural Pennsylvania as a focus of concern.*

I work out of my home the majority of the time in order to make my carbon footprint less significant. I can walk to banking, food, culture and entertainment in the next village or ride a bike. The traditional image of the rural village and its sense of community is still a reality in our agricultural valley.

Coal and limestone mining and other extractive industries across Pennsylvania are a further unregulated or under-regulated source for air pollution exposures – especially exposures to particulate matter emissions - in rural Pennsylvania and to lower income families in our agricultural communities.

These exposures deserve our attention.

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Now, focusing on the Clean Power Plan, I would first like to reiterate my concerns involving staffing at central office PADEP.

PADEP STAFF NEEDED

PADEP should be increasing its dedicated staff in its monitoring section, increasing monitoring stations for all criteria pollutants and monitoring for carbon capture across Pennsylvania, and tracking pollution levels at continuous emissions monitors (CEMS). These large scale monitoring efforts are underfunded and under-utilized. PADEP can not hope to successfully implement another federal air pollution reduction plan, such as the Clean Power Plan, without more trained and experienced staff.

That said, I believe that it is time *that personal air pollution monitoring* – both indoors and outside – is the next best technology to *better involve all our citizens in their own health care* by monitoring for air pollution exposures and allow individuals and families to make appropriate decisions about avoiding areas that have both acute and chronically high levels of air pollution. That monitoring is available in several forms including the measurement of black carbon. That knowledge of short and long term exposures collected weekly or monthly will enhance data collection by filling in the gaps in the large scale monitoring for these pollutants that is required by federal law, and routinely performed in Pennsylvania. Those collecting data can be

³"7Million Premature Deaths Annually Linked to Air Pollution." World Health Organization. March 25, 2014.

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certified by PADEP similar to the water pollution monitoring programs run by Dickenson University and their student water monitoring group ALLARM in Carlisle PA.

This monitoring will enhance our ability to fulfill our obligations to conform to the federal regulatory requirements under the Clean Power Plan. Pennsylvania's carbon and carbon dioxide pollution reduction obligations are achievable, but we *must proceed immediately to construct our state specific plan for these reductions.*

I commend PADEP for its public participation process (14 Listening Sessions) across Pennsylvania these last several months and urge PADEP to finish and submit their final plan by September 6, 2016 to EPA.

A Pennsylvania specific plan should include permanent incentives to increase our use of energy conservation and energy efficiency. Wind and solar manufacturing should be supported and incentivized. Solar facility construction was booming even in our agricultural valley when there were state rebates available for residential construction of wind and especially solar. Energy efficiency rebates will put our local plumbing and heating business back into the business of residential solar installation, increasing jobs, just as we had a few short years ago.

Thank you for the opportunity to comment.

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