

Comments on a Proposed Maintenance Plan for the Delaware County  
Nonattainment Area for Fine Particulate Matter  
by the  
League of Women Voters of Delaware County  
December 13, 2018

Did you ever have trouble going to sleep because of a barking dog? My parents suffered a sleepless night when visiting my home from Rhode Island many years ago. It was not a dog that kept them awake, however. It was my daughter with the croup.

Although our family lives in the upscale, residential community of Radnor Township, Delaware County, air quality knows no boundaries. The respiratory problems she experienced from childhood continue today as she keeps an inhaler in her purse and a portable nebulizer with her when she travels.

Because parents become passionate about issues that impact their children, air quality is one of the concerns about which I advocate. However, it is not just for my adult child, it is for all those impacted by failing air quality in Delaware County and beyond.

As a member of the League of Women Voters of Delaware County, my comments are being submitted on their behalf. As we continue to advocate for our right to clean air, pure water, and the preservation of our natural resources for generations yet to come, such opportunities for public input is most appreciated.<sup>1</sup> At the national level, the League of Women Voters (LWV) has a position on environmental protection and pollution control that was developed by consensus of its members in local Leagues, such as ours, throughout the nation.<sup>2</sup> Specifically, in regard to air quality, the LWV supports:

- Measures to reduce vehicular pollution, including inspection and maintenance of emission controls, changes in engine design and fuel types and development of more energy- efficient transportation systems
- Regulation and reduction of pollution from stationary sources
- Regulation and reduction of ambient toxic-air pollutants
- Measures to reduce transboundary air pollutants, such as ozone and those that cause acid deposition.<sup>3</sup>

The League is pleased that EPA's annual PM (fine particulate matter) standards is expected to provide significantly increased health and environmental projections. However, for residents of Delaware County, serious reservations exist for the following reasons:

- First, these air standards are reflective of averages. Residents living in and downwind of industrial areas, around pipeline compressor/pumping stations, and

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<sup>1</sup> Article 1, Section 27, Constitution of the Commonwealth of Pennsylvania

<sup>2</sup> See p. 58 [https://www.lwv.org/sites/default/files/2018-05/impact\\_on\\_issues\\_2016-2018.pdf](https://www.lwv.org/sites/default/files/2018-05/impact_on_issues_2016-2018.pdf)

<sup>3</sup> See p. 64 [https://www.lwv.org/sites/default/files/2018-05/impact\\_on\\_issues\\_2016-2018.pdf](https://www.lwv.org/sites/default/files/2018-05/impact_on_issues_2016-2018.pdf)

transportation hubs such as Philadelphia International Airport, I-95, and I-476 can experience significant peak emissions that, on averaging, appear to be relatively benign. The reality may be quite different.

The monitoring data collected in 2013-2015 may be adequate for attainment of the 2012 annual PM. Looking at data over a longer period of time again can obfuscate the reality experienced by those living near stationary sources that can, in the course of maintaining optimum operating pressures, reacting to emergency situations, or cleaning equipment, release particulate matter with serious health consequences.

To protect public health, consideration should be given to limits to single, large intensity incidents; an increase in the number and locations of monitoring facilities; and an emergency warning systems to alert residents of immediate or eminent threats to respiratory health and well-being.

• Second, relative to the Commonwealth, the failure to submit a State Implementation Plan (SIP) required that Pennsylvania meet obligations for new source review permit programs for the emission of VOCs and ammonia. The need for adequate review by the Commonwealth of the permitting process for new and renewed sources appears to be lacking based not only on the EPA's analysis but also by those who live in the area. Using data from 2015 does not reflect today's reality or that projected for the near future. Consider:

- the expansion of the rapidly growing Philadelphia Airport;<sup>4</sup>
- the increased traffic on the I-95 and I-476 corridors;<sup>5</sup>
- the "revitalization of industrial development" created by natural gas operations and the processing of other fossil fuels;<sup>6</sup> and
- the nearly 24-7 vehicular traffic and related impacts from the Covanta Trash to Steam Plant

The re-opening and re-purposing of pipelines and processing facilities at the former Sunoco refinery in Marcus Hook are of significant concern. As it continues to expand its operational capacity, its impact on air quality is expected to contribute to the cumulative impact of PM to Delaware County and the region. Given the financial and political pressures currently impacting decision-making, some question if standards will be permanent and enforceable.

• Third, Chester City, located in Delaware County, is an environmental justice zone. Such designation requires special consideration. The health impact of poor air quality and other pollutants on residents is clear and continuing.<sup>7</sup> The result of PM on climate change is also well known with different particulates having different impacts.<sup>8</sup> Chester is most vulnerable to climate change as documented in a fairly

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<sup>4</sup> <http://www2.philly.com/philly/business/Study-Philadelphia-International-Airport-has-154-billion-economic-impact.html>

<sup>5</sup> [http://www.dot7.state.pa.us/BPR\\_pdf\\_files/MAPS/Traffic/Traffic\\_Volume/County\\_Maps/Delaware\\_TV.pdf](http://www.dot7.state.pa.us/BPR_pdf_files/MAPS/Traffic/Traffic_Volume/County_Maps/Delaware_TV.pdf)

<sup>6</sup> <https://www.phillymag.com/articles/2014/09/29/philadelphia-pipeline-americas-next-energy-hub/>

<sup>7</sup> See the work of <http://ceet.upenn.edu/members-affinity-groups/who-we-are/>

<sup>8</sup> See <https://www.epa.gov/air-research/air-quality-and-climate-change-research>

recent NOAA report.<sup>9</sup> Improving – not just maintaining - air quality is one way to help mitigate climate change in such an at-risk location in Delaware County.

Given the dated information; the limited monitoring, and reporting of data by averages; the failure to include numerous sources for expanding PM and their cumulative impact on air quality in Delaware County; and the special consideration that should be given to an environmental justice zone, the League believes that a potential need for further revision in this plan may exist as PM in this area may not be maintained at anticipated levels.

The League of Women Voters of Delaware County appreciates this opportunity to provide comments to this important area that impacts the health and wellbeing of residents throughout our region. We trust that our reservations will be considered and your diligence will help the mission of the Department of Environmental Protection become reality.<sup>10</sup>

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<sup>9</sup> See links to

<https://seagrant.noaa.gov/News/Article/ArtMID/1660/ArticleID/209/The-City-of-Chester-Vision-2020-Climate-Adaptation-Planning-Elements>

<sup>10</sup> The **Department of Environmental Protection's mission** is to **protect Pennsylvania's** air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner **environment**.