

December 20, 2018

By Email

Department of Environmental Protection
Rachel Carson State Office Building
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ecomment@pa.gov
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Re: Lebanon County PM2.5—Public Comments on Proposal

Dear Ms. Rodriguez,

Clean Air Council (the “Council”) hereby submits the following comments on behalf of itself, Lebanon Pipeline Awareness, and Concerned Citizens of Lebanon County, in response to the Pennsylvania Department of Environmental Protection’s (the “Department”) proposed State Implementation Plan Revision: Maintenance Plan for the Lebanon County Nonattainment Area for the 2012 Annual Fine Particulate Matter National Ambient Air Quality Standard (“SIP Revision”) and related Redesignation Request, noticed in the *Pennsylvania Bulletin* on November 24, 2018.

Clean Air Council is a non-profit environmental organization headquartered at 135 South 19th Street, Suite 300, Philadelphia, Pennsylvania 19103. For more than 50 years, the Council has fought to improve the air quality across Pennsylvania. The Council is dedicated to protecting and defending everyone’s right to a healthy environment.

Lebanon Pipeline Awareness (LPA) is a local grassroots nonprofit organization that operates in collaboration with several other like-minded groups. Our mission is to provide information and raise public awareness on all aspects of pipeline impacts including: safety and health concerns, property devaluation, future economic development loss, construction damages, and especially impacts to air quality, farmland, forests, wetlands, waterways and for those along a pipeline right of way, quality of life. We serve as advocates for affected landowners in our county and also for the general citizenry. LPA provides awareness of larger issues including the negative impacts of

the current fossil fuel economy and particularly the natural gas industry in Pennsylvania. We firmly support the necessary transition to a renewable energy future.

Concerned Citizens of Lebanon County is a grassroots, nonprofit unincorporated association. Our mission is to keep citizens informed about the Sunoco Mariner East Pipeline Project and similar projects that may affect the health, safety and welfare of those who live, work and recreate in Lebanon County. We are a public interest organization, government watchdog and advocacy group for good government. We work with other groups who have similar objectives.

Comments

1. The Department has not Established that the Improvement in Air Quality is Due to Permanent and Enforceable Reductions in Emissions.

The Department seeks redesignation of the Lebanon County Area under Section 107(d)(3)(E) of the Clean Air Act. Clause (iii) conditions approval of redesignation on a finding by the EPA Administrator that “the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the applicable implementation plan and applicable Federal air pollutant control regulations and other permanent and enforceable reductions.” The Department’s approach to this demonstration is a process of elimination: asserting that climate, population, and general economics did not cause the decrease. *See* Redesignation Request at pp. 6-12. The Department nowhere shows direct causation between the emissions decreases and permanent and enforceable environmental measures.

The Department appears to be on solid footing that climate and population size changes have not led to the decrease in PM2.5. However, the Department misinterprets the economic data and leaves other important factors unexamined.

In terms of economics, the Department considered the labor force in Lebanon County and the Federal Reserve’s Coincident Index for Pennsylvania. *Id.* at pp. 10-11. The labor force data showed that the size of the labor force was static over the 2011 to 2017 analysis period. *Id.* at Figure I-6. Because the State Coincident Index looks at Pennsylvania on a macroeconomic level, it is not appropriate for analyzing the much smaller Lebanon County Area. The county-level data do not show a simple upward trend line, but rather a mixed picture with some indicators on an upward trend and others on a downward trend. Inflation-adjusted wages dropped almost ten percent in Lebanon County between 2011 and 2015. *See* Federal Reserve Bank of St. Louis Economic Data, <https://fred.stlouisfed.org/series/MWACL42075>. On the other hand, in the Lebanon Metropolitan Statistical Area, unadjusted GDP went up over that time. *Id.* at <https://fred.stlouisfed.org/series/NGMP30140>. It is not clear from the more granular data that general economic activity increased while emissions decreased, which appears to be the Department’s conclusion.

Moreover, the Department has not taken into consideration other indicators that may better track activities which cause fine particulate pollution. The Department’s emissions inventories record that onroad and area sources are by far the largest sources of emissions in Lebanon County. *See*, e.g., Table III-1. The Pennsylvania Department of Transportation tracks trends in vehicles miles traveled in the state. From 2011 through 2017 there has been a consistent downward trend in

highway traffic in Pennsylvania, reversing an earlier upward trend. PennDOT, “Pennsylvania Highway Statistics: 2017 Highway Data,” available at <http://www.dot.state.pa.us/public/pubsforms/Publications/PUB%20600.pdf>. The Department should be considering onroad activity trends in determining what led to the decrease in fine particulate emissions in the Lebanon County Area.

Overall, the Department’s methodology is sparse and not enough to prove that environmental protection programs generated the PM2.5 emissions reductions.

2. The Department Relies on Unwarranted Assumptions about Electrical Generation in Lebanon County.

On page 17 of the SIP Revision, the Department estimates future emissions from “the electric generation facility in the Lebanon County Area” based on “regional growth factors.” The Department’s work on emissions growth from the one facility appears careful and reasoned. However, the Department has not taken into account a recent burst in proposals for natural-gas-fired power plants stemming from the Marcellus Shale boom. *See* Energy in Depth, “Natural Gas Power Plants Bring Major Investments, Jobs to Pennsylvania,” Oct. 24, 2017, available at <https://www.energyindepth.org/natural-gas-power-plants-bring-major-investments-jobs-pennsylvania/> and Food & Water Watch, “Pernicious Placement of Pennsylvania Power Plants: Natural Gas-Fired Power Plant Boom Reinforces Environmental Injustice,” 2018, available at https://www.foodandwaterwatch.org/sites/default/files/rpt_1806_pagasplants_web3.pdf. Just a year ago, there were twenty plants in permitting or under construction. Pennsylvania has positioned itself as an electricity exporter. It is unlikely Lebanon County will have only one EGU for long. There is already a Tenaska proposal for a new gas-fired plant in Lebanon County, though the status of that is unclear. *See* Fact Sheet: Tenaska Lebanon Valley Generating Station, available at <http://tenaskaprojects.com/wp-content/uploads/sites/8/2013/08/LebanonCountyFactSheet.pdf>. More proposals are likely.

Because of this, EGUs with emissions polluting air in Lebanon County are likely to increase in number, not merely intensity. This unexamined fact undercuts the Department’s conclusions about projected point source PM2.5 emissions in Lebanon County.

3. The Department should not Rely on CAFE Standards that the Federal Government is Trying to Roll Back.

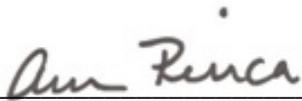
In detailing the measures that the Department considers permanent and enforceable that would keep PM2.5 levels attaining the NAAQS, the Department includes “the federal light-duty greenhouse gas standards (promulgated October 2012, 77 FR 62623), which began phasing in with the 2017 model year.” Informally, these are “CAFE standards.” EPA and the National Highway Traffic Safety Administration have proposed a new regulation to roll back the newer CAFE standards, with the “Safer Affordable Fuel-Efficient Vehicles Rule.” *See* 83 FR 42986, <https://www.nhtsa.gov/corporate-average-fuel-economy/safe> and <https://www.govinfo.gov/content/pkg/FR-2018-08-24/pdf/2018-18418.pdf>. The Department should not rely on recent measures which the current U.S. administration is trying to reverse as “permanent and enforceable” methods for maintaining PM2.5 attainment.

Thank you for the opportunity to comment. Please keep us apprised of any future actions related to the SIP Revision and Redesignation Request.

Sincerely,



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