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Policy Office
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Attn: Jessica Shirley, Director

Re: Pennsylvania Regional Haze Best Available Retrofit Technology
49 Pa. Bull. 5065 (Aug. 31, 2019)

Dear Ms. Shirley:

As an avid National and State Park supporter, I write to urge Pennsylvania's Department of Environmental Protection to strengthen its Regional Haze State Implementation Plan to reduce emissions that harm both people and important places such as our National Parks and Pennsylvania's many State Parks. Our state of Pennsylvania is filled with amazing destinations.

The mix of national and state parks in Pennsylvania ranges from the breathtakingly scenic Pine Creek Gorge to the monument-rich Valley Forge National Historical Park. Many of the national park sites in Pennsylvania are designated historical sites that offer walking trails and other outdoor activities as a unique way to experience the natural beauty in the state. Pennsylvania has 121 state parks, 19 national park sites, and seven National Heritage Areas. You can wander to any quadrant of the state and find a concentration of national and state parks, each worth exploring for their own reasons.¹ It now falls to you to help protect these wonderful places, not only for us, but for future generations.

As you know, Haze occurs when small particles of air pollution scatter and absorb sunlight, blurring scenic views and decreasing the distance that can be seen from overlooks. In response to this problem, Congress enacted Section 169A of the Clean Air Act to protect visibility in national parks and wilderness areas. The Environmental Protection Agency (EPA) subsequently promulgated the Regional Haze Rule in 1999. The program directed states to implement pollution control

¹ <https://www.planetware.com/pennsylvania/top-rated-national-and-state-parks-in-pennsylvania-us-pa-119.htm>

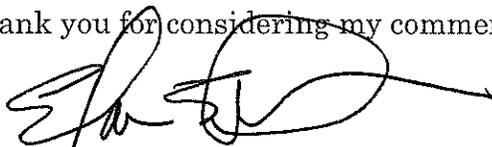
plans to improve visibility and air quality at national parks. Since the implementation of the regional haze program, the data has shown that, on average visual range has increased from 90 to 120 miles in some western parks and from 50 to 70 miles in some eastern parks.²

In addition to the benefits for visitors at parks, the regional haze program delivers public health benefits. The primary pollutants that cause regional haze, including particulate matter, nitrogen oxides (NO_x), sulfur dioxide (SO₂), and volatile organic compounds (VOCs), are linked to serious health effects including premature death. Some of these pollutants also contribute to acid rain. Implementation of the Regional Haze Rule and associated regulations has produced sharp declines in the emissions of those pollutants, resulting in improved air quality as well as improved visibility in scenic areas.

Please take these facts into consideration. Your actions will have a significant impact. Please make sure it is a positive one. Specifically, Pennsylvania should require cement plants to reduce their emissions. The Commonwealth must require that cement kilns at the Lafarge Whitehall and Lehigh Cement Plants meet industry-standard pollution control measures to reduce emissions of nitrogen oxides, which contributes to hazy, unhealthy air in Gettysburg National Military Park, Valley Forge National Historic Park, and the Delaware Water Gap National Recreation Area, as well as throughout our state. In addition, Pennsylvania should revisit its analysis of best available technology, including the industry claimed costs, and other important aspects of its analysis with additional scrutiny. Lastly, Pennsylvania should explain how its emissions reductions will differ from the reductions that are assumed in regional air modeling for Northeast states.

I am not writing on behalf of any particular political party, nor with any agenda other than someone, like yourself, who lives in the State, enjoys the wonderful nature that surrounds us, and cares about the quality of life and clean air. For all of us, I urge Pennsylvania to strengthen its regional haze plan to require reasonable and more effective controls on harmful pollution.

Thank you for considering my comments on the proposal.

A handwritten signature in black ink, appearing to read 'Marc M. Orlow', with a long horizontal flourish extending to the right.

Marc M. Orlow

² Regional Haze Rule, Caitlin McCoy, Laura Bloomer 04/23/2018 - Regulatory Rollback