

Testimony to the Ozone Transport Commission Hearing
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Good morning and thank you for your attention to this problem. As a resident of Philadelphia, subject to the impact of the various pollution loopholes crafted by Pennsylvania to have the least impact on industry, and in the middle of a very hot summer that has seen 11 air quality orange alert days for ozone during this ozone season, I ask you to support Maryland's petition and recommend that Pennsylvania be required to operate in a way that protects human health.

I've testified about air quality standards many times over the years, in speaking at an EPA hearing in January of 2015 on National Ambient Air Quality Standards for Ground-level Ozone and relating to them the PA was proposing to allow 30-day averaging, I said this:

"people do not get to breath on average. Bad-air days are exactly the ones we need to eliminate, rather than looking for ways to hide them in the data."

Unfortunately, that and other loopholes were adopted in Pennsylvania and we are living with the impacts today along with Maryland.

Epidemiologists and other health professionals have been raising the alarm for years about how exquisitely sensitive human lungs are to pollution. This hearing is good timing because a study was just released, jointly conducted by the University of Washington, Columbia University and the University of Buffalo. This is footnoted in my written notes.

It was an 18-year study, funded by the EPA, including more than 7,000 people in six metropolitan areas including Chicago, Winston-Salem, Baltimore, Los Angeles, St. Paul and New York. It involved detailed measurement of participants' exposures to pollution and more then 15,000 CT scans.

I'd like to read four brief quotes from a University of Washington article summarizing the findings:

“To our knowledge, this is the first longitudinal study to assess the association between long-term exposure to air pollutants and progression of percent emphysema in a large, community-based, multi-ethnic cohort,”

"We were surprised to see how strong air pollution's impact was on the progression of emphysema on lung scans, in the same league as the effects of cigarette smoking"

“Over a 10-year time span, if ozone levels in a city are just three parts per billion higher than a comparable city with no ozone increase, that increases a person's risk of emphysema as much as if they had smoked a pack of cigarettes a day, every day for 29 years”

“Air pollution — especially ozone air pollution which is increasing with climate change — accelerates the progression of emphysema of the lung,”

<https://www.washington.edu/news/2019/08/13/air-pollution-can-accelerate-lung-disease-as-much-as-a-pack-a-day-of-cigarettes/>

Ozone can cause health problems even when exposure is limited to short durations. That is why the federal standard for smog is based on ozone levels over an 8-hour period.

Even the 30-day average emissions limit for NO_x of 0.12 lbs/MMBtu is high, compared to what the plants have proven they can achieve. Pennsylvania power plants have routinely achieved emission rates of 0.04 to 0.08 lbs/MMBtu on an hourly basis when their pollution control equipment is optimized, so they should have no trouble complying with a rate of 0.12 lbs/MMBtu on a short term, 24-hr basis. This would ensure a much greater level of protection against excessive smog days for both Maryland and Pennsylvania. With climate change the number of unhealthy ozone days will only increase and Philadelphia already has a childhood emphysema rate more than twice the national average.

I urge support for the Maryland petition.