

CITY OF PHILADELPHIA
AIR POLLUTION CONTROL BOARD

IN RE: Public Hearing - proposed amendments
Air Management Services Regulation VI

DATE: Wednesday, August 10, 2022

LOCATION: Zoom Teleconference

REPORTED BY: Stacy Raub, Court Reporter

HELD BEFORE: DR. PALAK RAVAL-NELSON, Chair APCB
DR. EDWARD WIENER, Member, APCB
DR. CHERYL BETTIGOLE, Member, APCF
JIAZHENG LI, Board staff

ALSO PRESENT:

MICHELLE MABSON, Staff Scientist, Earth Justice
STEVEN KRATZ, President, PCIC
ADAM NAGEL, Campaign Manager, PennFuture
MATT WALKER, Advocacy Director, Clean Air Council
AMANI REID, Pennsylvania Interfaith Power and Light
PETER FURCHT, Resident, City of Philadelphia
MATTHEW PAGE, Eco Energy Distribution Services
SAGE LINCOLN, Resident, City of Philadelphia
JONATHAN CHASE, Assistant VP, Environmental Health and
Radiation Safety at Drexel University
LYNN ROBINSON, Director, Neighbors Against the Gas Plants
RUSSELL HICKS, Co-Chair, POWER Interfaith Climate Justice
MITCH CHANIN, Member, POWER Interfaith Climate Justice
KATLYN CONNOR, Resident, City of Philadelphia
LYNDSAY CHRISTINEE, Delegate, Southeastern Pennsylvania
chapter, the Sierra Club
LISA HASTINGS, Environmental Justice Chair, Pennsylvania
Legal Women Voters Environment Committee
CORYN WOLK, Resident, City of Philadelphia

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P R O C E E D I N G S

1
2 DR. RAVAL-NELSON: Good evening everybody and thank
3 you for joining us for the Public Health Hearing
4 regarding Air Management Services Regulation VI, also
5 known as AMR VI. This public hearing will end at 9:00
6 pm and we will make every attempt to include everyone
7 that would like to speak.

8 We have 13 participants that have pre-registered
9 requesting to provide verbal comments. They will each
10 be given five minutes to speak. At 4 minutes and 30
11 seconds I will buzz in and let folks know that they
12 have 30 seconds left.

13 Apologies, my name is Dr. Palak Raval-Nelson and I
14 am the Deputy Health Commissioner for the Philadelphia
15 Department of Public Health. Please note that
16 responses in the Q&A or items put in the chat will not
17 be counted or considered as comments. We ask that
18 everybody provide additional written comments and
19 direct them to Benjamin.hartung@phila.gov. Additional
20 written comments will be accepted until September 9,
21 2022.

22 Please state and spell your full name and we will
23 begin with the order of speakers that have registered.
24 Once those thirteen speakers have finished their

1 testimony and/or verbal comments we will then allow a
2 raising of hands for those that want to speak. We will
3 then at that point unmute the folks that are on the
4 phone as well and they will get an opportunity to
5 explain that they would like to speak at which point we
6 will go in the order in which the requests were made.

7 The Air Pollution Control Board will be listening
8 to all of the comments. There will be no dialogue or
9 responses this evening. Instead, all comments will be
10 recorded and transcribed for the Board to review and a
11 response will be provided after the review.

12 We will begin with Mr. Edward Wiener of AMS who
13 will provide a brief description regarding the proposed
14 changes to this regulation, Ed.

15 MR. WIENER: Thank you Palak. My name is Edward
16 Wiener. I am the Chief of Source Registration, which
17 is the permitting section for Air Management Services
18 of the Philadelphia Department of Public Health. Please
19 note that this public hearing is being recorded.

20 We are here to accept testimony on the proposed
21 amendments to Air Management Regulation VI, control of
22 emissions of toxic air contaminants. The proposed
23 modifications to Air Management Regulation VI include
24 increasing the current list of toxic air contaminants

1 from 99 chemicals to 217 chemical compounds and
2 compound groups, including all chemicals designated as
3 a hazardous air pollutant or HAP by the US
4 Environmental Protection Agency or EPA.

5 The proposed modifications would also establish
6 threshold levels for each toxic air containment and
7 require a risk assessment for permit applications for
8 projects that have the potential to emit at least one
9 toxic air containment beyond their threshold limit.

10 DR. PALAK RAVAL-NELSON: Excellent, thank you very
11 much Ed. At this point we are going to begin with our
12 first verbal comment speaker, Michelle Mabson of Earth
13 Justice, staff scientist of Healthy Communities. You
14 will have five minutes to provide your verbal comments.

15 MICHELLE MABSON: Hi, can I just take a moment to
16 make sure you all can hear me?

17 DR. PALAK RAVAL-NELSON: Yes, we can hear you
18 loudly and clearly. Thank you very much.

19 MS. MABSON. Excellent, okay well good evening my
20 name is Michelle Mabson. And again I am a staff
21 scientist at Earth Justice which is an environmental
22 non-profit law organization working to protect the
23 right to a healthy environment. We have offices around
24 the country, including in Philadelphia. The Air

1 Pollution Control Board and Air Management Service's
2 decision to take action to amend and strengthen AMR VI
3 by incorporating health risk assessments into the air
4 permitting and licensing process is an important step
5 toward ensuring all Philadelphians can live in safe and
6 healthy communities with clean air.

7 While we recognize the significance of the
8 amendments, we are concerned that they would not do
9 enough to address serious health threats and because
10 they do not take in account accumulative health risks,
11 they may not fully protect the public from toxic air
12 pollution.

13 We urge the Board to listen carefully and respond
14 to all community members concerns raised here and
15 written comments and to ensure your action fully and
16 faithfully implements all clean air requirements and
17 provides stronger health protections for
18 Philadelphians, especially neighborhoods long over-
19 burdened with air pollution.

20 The regulation and associated benchmarks for action
21 need to be strengthened to account for health risks
22 based by a vulnerable populations like children,
23 infants and fenceline communities that are
24 disproportionately burdened by environmental hazards.

1 Studies show us that pollution burden and adverse
2 health outcomes are not distributed equally across the
3 city.

4 Respiratory conditions like asthma have been linked
5 to increased exposure to toxic air pollution and
6 according to a Center of Excellence in environmental
7 toxicology report, black and Hispanic children in
8 Philadelphia experience asthma related hospitalization
9 at a rate that is five times higher than non-Hispanic
10 white children. We and other commenters have
11 identified and outlined what we hope the Board will
12 find to be helpful and positive changes to the current
13 regulations that would meaningfully protect communities
14 from pollution. We urge you to make targeted
15 improvements to the rule and guidelines and finalize
16 these as soon as possible this year so they can take
17 effect.

18 More specifically, the regulations should afford
19 the public the opportunity to review and provide input
20 on health risk assessments and risk mitigation plans.
21 Because the community needs to be able to access and
22 have a voice in the implementation of this rule. We
23 ask that the health risk assessments and risk
24 mitigation plan be made publicly available, and that

1 AMS be required to respond to public input before final
2 action is taken.

3 Similarly, we ask that the Board commit to revise
4 and review the AMR VI regulations and associated
5 guidelines every five years to account for advances in
6 the best available science. Such review will allow the
7 Board to learn from implementation of the rule and to
8 strengthen it and the guidelines over time. This will
9 ensure that adequate protection of communities and give
10 the public the opportunity to weigh in on any of these
11 that impact community health as scientific knowledge
12 advances.

13 The Board should also strengthen key components of
14 the rule and guidelines for risk assessment. The
15 guidelines need to do more than just assess health
16 risks from individual pollutants, one by one, and it is
17 essential for the Board to employ an approach that
18 aggregates or combines health risks across multiple
19 pollutants emitted by a single source. The guidelines
20 should account for the cumulative cancer and non-cancer
21 risk associated with all pollutants that may be emitted
22 from a given source and the added risk from multiple
23 polluting sources that are located in close proximity
24 to communities.

1 The EPA has outlined best practices for conducting
2 risk assessments and at minimum this includes
3 aggregating cancer risks from all pollutants at a given
4 sources and combining non-cancer health risks for
5 pollutants that target the same organ or organ system.
6 Additionally, EPA recognizes the importance of
7 considering multi-pathway risks associated with the
8 ingestion of persistent and bio accumulative
9 pollutants, like lead and mercury. Such pollutants can
10 cause added health risks when they are emitted from a
11 source and build up in the soil of nearby communities.

12 To conclude, we thank the Board for taking much
13 needed steps incorporate health considerations into its
14 air permitting and licensing procedures. And even so,
15 allowing a 100 in a million cancer risks from just a
16 single pollutant is far too high that leaves children
17 and other vulnerable populations unprotected. Ensuring
18 mitigation at least at one in a million is essential
19 based on the worth current approach as we have
20 discussed in written comments. Sister agencies employ
21 a far low cancerous benchmark for mitigation and action
22 and the Board should draw on those helpful tools here
23 to protect Philadelphians.

24 We sincerely hope the Board will seriously consider

1 our written comments and all comments from the public
2 today and elsewhere and follow through with stronger
3 new actions make the City of Philadelphia a true leader
4 on these critical issues for public health. Thank you
5 for your time.

6 DR. RAVAL-NELSON: Thank you very much, you hit it
7 right on the mark. I appreciate that and at this point
8 I know there is a question regarding a call-in number.
9 So, I am going to ask before we move to Mr. Steve Kratz
10 at the next testifier, I would like that Jiazheng from
11 AMS please state the phone number for call in.

12 MR. LI: Hi, this is Jaizheng Li. I just posted
13 all the call-in numbers in the chat box. I can read -
14 there's many - I can read out a few.

15 DR. RAVAL-NELSON: That would be great. If you
16 could read out at least three Jiazheng that would be
17 great because folks that are on the phone may not have
18 access to the chat.

19 MR.LI: Okay, so you can call 1(646)931-3860 or 1-
20 (301)715-8592, or 1(312)626-6799.

21 DR. RAVAL-NELSON: Wonderful, is there a passcode
22 Jiazheng that folks will need to enter?

23 MR. LI: There is no passcode. There is a webinar
24 id, which is 881 4046 9905 and if you are prompted to

1 enter your personal id you can just press #.

2 DR. RAVAL-NELSON: Excellent, we will go ahead and
3 make that reannouncement after every so many speakers.

4 Thank you, Jiazheng.

5 Mr. Steve Kratz, you are up next. You are the
6 president of the Pennsylvania Chemical Industry
7 Council. You will have five minutes to speak. At 4
8 minutes and 30 seconds I will let you know you have
9 thirty seconds left. Mr. Kratz?

10 MR. LI: Mr. Kratz, you can unmute yourself.

11 DR. RAVAL-NELSON: Mr. Kratz, are you available to
12 speak?

13 DR. BETTIGOLE: He'S, I think, in the chat asking
14 if we can hear him, so I think there is a problem with
15 unmuting.

16 MR. KRATZ: I just got a notification I am unmuted
17 now. So, thank you for doing that.

18 DR. RAVAL-NELSON: Wonderful, thank you. You have 4
19 minutes and 30 seconds sir, starting now.

20 MR. KRATZ: Thank you for the opportunity to
21 provide public comments this evening in regards to the
22 proposed revised to Air Management Regulation VI
23 governing the control of emissions of toxic air
24 contaminants. For the last 30 years the Pennsylvania

1 Chemical Industry Council (PCIC) has served as the
2 industry trade group representing Pennsylvania chemical
3 and plastics manufacturing operations. The chemical
4 industry has always been an important sector of
5 Philadelphia's economy and essential for providing
6 products that protect the health and safety of our
7 citizens. Our industry is critical for manufacturing
8 everyday products that are essential to living modern
9 life, ranging from nearly every healthcare product that
10 is the building block for cleaner energy options, high
11 performing building materials, food packaging, and the
12 list goes on.

13 Our members are continually and voluntarily seeking
14 new ways to improve energy efficiency and reduce
15 emissions in manufacturing and operations. In fact,
16 many of our member companies are leading the charge to
17 advance new innovations with a focus of sustainability,
18 circular manufacturing, and establishing lower no
19 carbon goals. The health and safety of our
20 environment, our employees, and all citizens of
21 Philadelphia is our highest priority and PCIC supports
22 regulation that uses sound science to achieve societal
23 goals.

24 Unfortunately, our members believe that many

1 provisions with the proposed revisions to Air
2 Management Regulations VI are unattainable, if not
3 impossible, for the regulated industry to achieve and
4 for regulators to implement. On behalf of PCIC we
5 respectfully request the city of Philadelphia to
6 revisit the proposed regulation and work with industry
7 and other stakeholders through a regulatory advisory
8 panel to advance the regulation that will be effective
9 for protecting public health without stifling economic
10 growth and job creation. We believe this panel should
11 be engaged prior to the proposed regulation being
12 published and implemented.

13 Our industry has a strong track record of working
14 with regulators to develop such solutions to protect
15 and enhance public health and safety. The operations
16 of our facilities are already subject to multiple
17 levels of state-of-the-art pollution controls, and
18 federal, state and local regulation. These include,
19 but are not limited to, Title V air permits, PA and
20 Philadelphia RACT rules, the federal MACT as part of
21 the national emissions standards for hazardous air
22 pollutants program, and best management practices
23 including responsible care which is the foundation of
24 our industries commitment to sustainability.

1 These comprehensive regulatory requirements at all
2 levels of government are in place to ensure that our
3 members operate their facilities in a manner that takes
4 great care to protect the health, safety and
5 environment for all Philadelphians.

6 The proposed AMR VI regulations contains various
7 segments that would create uncertainty both for the
8 regulatory community and the implementing agencies.
9 Here are a few examples, the proposed regulation calls
10 for the reforms of a health risk assessment for toxic
11 air contaminants but states no criteria upon which the
12 study is to be performed or reviewed. The triggers for
13 a full risk assessment are unclear in the proposed
14 changes. Site specific permitting decisions is based
15 on existing ambient conditions that do not result from
16 a facility is inconsistent with the permitting approach
17 taken by surrounding states in the EPA. Also, it is
18 not practical or appropriate for an applicant to be
19 responsible for emissions of other surrounding
20 operations over which they have no control over.

21 For Title V facility permit renewals the proposed
22 AMR VI does not provide any guidance on how a facility
23 is expected to address results of an assessment that
24 indicate an unacceptable risk. There are no guidelines

1 for consideration of costs or technical feasibility of
2 a potential emission abatement approach. There is also
3 uncertainty around the air contaminants included in the
4 changes due to different variations listed in the
5 proposal compared to other risk screen workbooks.

6 The current version of the regulation will result
7 in potential unintended consequence of shuttering
8 valuable facilities due to a net calculation of health
9 risks, that far exceeds actual risks, and presumed
10 unlikely confluence of events used in modeling
11 assumptions.

12 On behalf of our members PCIC makes the following
13 recommendations for consideration. Any facility that
14 is already subject to an industry specific NESHAP'S or
15 MACT or RACT regulation is exempt from this regulation
16 because facilities are not able to control unregulated
17 non-permitted sources of emissions beyond their
18 facility boundaries, we believe permitted operations
19 should be evaluated only on their actual emissions.
20 Background emissions we don't believe should be part of
21 any permit renewal. The provision regarding review of
22 the existing air toxic concentrations surrounding the
23 emissions source prior to approving or disapproving a
24 permit we believe should not be included. And due to

1 uncertain definition of lack of information and the
2 ability to collect such information reliable and
3 accurately, reviewing surrounding area emissions should
4 not be a requirement for a permitted facility.

5 DR. REVAL-NELSON: Sir, excuse me you have thirty
6 seconds left.

7 MR. KRATZ: Okay, thank you. The Department of
8 Public Health and AMS should take into consideration
9 the full costs and benefits of any regulatory change,
10 including the potential loss of jobs, disruptions in
11 supply chains and the potential that the closure or
12 reduced operation of facilities could lead to an
13 increase in emissions or facilities right outside of
14 your border with less stringent regulations.

15 We respectfully request the City of Philadelphia
16 revisit this proposed regulation and work with industry
17 and other stake holders through a regulatory advisory
18 panel to develop a regulation that will protect human
19 health and the environment while allowing our members
20 to continue operating, investing, and thriving in the
21 City of Philadelphia. Thank you for your time and for
22 the opportunity to provide comment tonight.

23 DR. REVAL-NELSON: Excellent, thank you very much
24 sir. You ended exactly at thirty seconds. We have Mr.

1 Adam Nagel that will be speaking next. But before we
2 get to Adam I just want to reiterate that we will be
3 accepting written comments and they can be submitted
4 via email to the same person you have been sending the
5 comments to, Benjamin.hartung@phila.gov up until
6 September 9th and this hearing is being recording, and
7 the Board will get the full transcription of this
8 recording as well. So, without further adieu, Mr. Adam
9 Nagel I will unmute you and you are with PennFuture
10 Campaign Manager.

11 You have 4 minutes - or, 5 minutes to start talking
12 and I will let you know when we are at the 4 minute and
13 30 seconds mark.

14 MR. NAGEL: Okay, thank you very much. Good
15 evening and thank you for providing me with the
16 opportunity to provide verbal comments regarding the
17 proposed amendments to Air Management Regulation VI.
18 My name is Adam Nagel and I do serve as campaign
19 manager for PennFuture in the City of Philadelphia.

20 PennFuture is a statewide environmental advocacy
21 non-profit. We are leading the transition to a clean
22 energy economy in Pennsylvania and beyond. We are
23 protecting our air, water, and land and powering so
24 that we can build sustainable communities for future

1 generations. As stated in the generally submitted
2 written comments, we are pleased that Air Pollution
3 Control Board, Department of Public Health, and the Air
4 Management Services are operating health considerations
5 in the air permitting and licensing process with a goal
6 to better protect public health.

7 So, we believe that the proposed amendments point
8 to a greater recognition of the need to update
9 Philadelphia's air management regulations. We maintain
10 that the Board must strengthen the proposed regulations
11 to better protect the health of frontline communities
12 and vulnerable populations. PennFuture strongly
13 recommends that guidelines should assess the cumulative
14 risk or impact of all pollutants that single source
15 releases to the greatest extent feasible, rather than
16 the proposed approach that only analyzes individual
17 risks from a single source. To do so would finally
18 recognize that Philadelphia residents do not experience
19 individual health impacts from individual pollutants.
20 But experience cumulative impacts from the collection
21 of toxic emitted pollutants across the city.

22 We also reiterate that the guidelines should also
23 address the particular vulnerability, toxic air
24 pollution that children and other community members

1 face based on age of exposure, socioeconomic
2 disparities and other factors. We can no longer ignore
3 that low-income communities and communities of color
4 have suffered a disproportionate impact from
5 historically racist practices like red-lining and
6 short-sided environmental policies that directly harm
7 their friends and families. Acknowledging this history
8 will allow us to begin to recalibrate our priorities
9 and move away from racist practices that have created
10 sacrifice zones of the city in the name of economic
11 gain.

12 Cumulative impact analysis is gaining momentum
13 across the country as legislatures and regulators of
14 every level of government seek to address the undue
15 burden of environmental harm born by communities of
16 color and low-income communities. California began
17 focusing on cumulative impact in the early 2000s. In
18 2020 New Jersey passed the nations' first comprehensive
19 law on environmental justice and community impact,
20 cumulative impact, at the state level.

21 Similar legislation has been introduced in
22 Pennsylvania by members of the General Assembly. At
23 the local level, the City of Newark passed it's own
24 environmental justice and cumulative impact ordinance

1 in 2016 and in Philadelphia, City Council Member Helen
2 GYM introduced the Community Health Act earlier this
3 year.

4 The City of Philadelphia, the Department of Public
5 Health, the Air Pollution Control Board and the
6 Division of Air Management Services are uniquely
7 situated to lead on this critical initiative to better
8 protect public health given it's delegated authority
9 from the state to regulate air emissions and establish
10 standards that protect our constitutional right to
11 clean air as defined in Article I, Section 7 [sic] of
12 the Pennsylvania Constitution which clearly states,
13 "The people have a right to clean air, pure water and
14 to the preservation of the natural, scenic, historic
15 and esthetic values of the environment. Pennsylvania's
16 public natural resources are the common property of all
17 the people, including generations yet to come. As
18 trustees of these resources the Commonwealth shall
19 conserve and maintain them for the benefit of all the
20 people."

21 The Board is also better equipped to measure
22 cumulative impact because it is situated within local
23 government, which provides a distinct advantage in
24 gathering data at a more granular level, to better

1 illustrate the pollution burdens experienced by local
2 communities. PennFuture also recommends that the
3 guidelines be revised to more clearly define and
4 strengthen opportunities for public participation and
5 public input throughout the permitting process. Though
6 not unique to the Board, public engagement of
7 proceedings tend to take the shape of a formal meeting.
8 They are often held toward the end of the
9 decision-making process and are organized to fulfill
10 requirements by streamlining the collection of public
11 input. This can have a chilling effect on public
12 participation and reflect structural inequalities in
13 society. Community members may not feel comfortable
14 providing testimony in a formal setting and rightfully
15 question whether their input will impact the final
16 outcome.

17 As the Board's position within local government
18 defers on it a greater ability to truly measure
19 cumulative impact on neighborhoods across Philadelphia,
20 that same position also offers a more direct line of
21 communication with residents than the public typically
22 enjoys with state or federal officials. This should
23 allow the Board to facilitate more meaningful efforts
24 to solicit public participation and input over a longer

1 period of time. Public participation guidelines should
2 ultimately empower community members and provide
3 clearly prescribed methods for the Board and regulated
4 industry to engage with residents as decision makers,
5 rather than embody vague standards that are purely
6 performative and fall short of guaranteeing substantive
7 input from those most impacted by toxic communities.

8 DR. PAVAL-NELSON: Sir, you have thirty seconds.

9 Mr. NAGEL: Thank you very much. Environmental
10 justice and public health considerations must be at the
11 heart of our policies and regulations related to land
12 use, zoning, and development. Environmental justice
13 and public health considerations must be at the heart
14 of our environmental policies and emission relation.
15 For far too long we have subjected overburdened
16 communities to the increasingly negative impact of
17 polluting industries for the sake of profit.

18 PennFuture supports the Board's proposed aim of giving
19 greater consideration to the health impact of
20 emissions, however, the proposed amendments must be
21 strengthened to ensure that the regulations actually
22 provide the necessary protection to Philadelphia's
23 frontline communities and it's most vulnerable
24 population. Thank you again for this opportunity.

1 DR. PAVAL-NELSON: Excellent. Thank you very much
2 sir. Our next speaker will be Tammy Murphy, I do not
3 see you on the list. I don't know if you are as a
4 participant calling in. If you are, please unmute
5 yourself. Tammy is with the Physicians for Social
6 Responsibility and is a Pennsylvania Advocacy Director.

7 (No response)

8 DR. RAVAL-NELSON: Okay, we will move to the next
9 speaker. Mr. Matt Walker from Clean Air Council, he is
10 the Advocacy Director. Sir, you will have 5 minutes to
11 speak and at 4 minutes and 30 seconds I will politely
12 interrupt you and let you know the time. You may
13 begin.

14 MR. WALKER: Can everyone hear me? My name is Matt
15 Walker and I am the Advocacy Director at Clean Air
16 Council. We are a non-profit environmental health
17 organization headquartered in Philly. The Council has
18 been working to protect everyone's right to a healthy
19 environment for over 50 years.

20 The Council appreciates that the Air Pollution
21 Control Board and Air Management Services recognized
22 the critical need to better regulate sources of toxic
23 air pollution and reduce cancer risks from large
24 industrial sources in Philadelphia. The Council

1 strongly supports the decision to include a health risk
2 assessment requirement to better consider health
3 impacts during the air permitting process. If done
4 right, this rule could be a major step forward in
5 protecting public health especially for cities most
6 vulnerable populations. However, the Council believes
7 that the current rule should be strengthened to be sure
8 we better protect all Philadelphia residents.

9 Especially children, the elderly, those with pre-
10 existing health issues, and black and brown communities
11 already harmed by existing pollution sources. Black
12 communities are exposed to 38% more pollution than
13 white communities and black residents are 75% more
14 likely to live in fence line communities near
15 industrial facilities than the average American.

16 According to the ALA the Greater Philadelphia area
17 continues to be among the 25 most polluted regions in
18 the US. Philadelphia has a 7.5% higher cancer rate
19 than the national average, with some parts of the city
20 having even higher rates. Philadelphia communities,
21 specifically black and Hispanic residents, experience
22 disproportionately higher rates of asthma related
23 hospitalization and are more vulnerable to health
24 impacts caused by high levels of multiple air toxics.

1 The Council strongly urges the Board to strengthen
2 the proposed risk benchmarks in the rule as they do not
3 adequately protect against accumulative health impacts
4 of pollution. The proposed regulations would only look
5 at individual risks from individual pollutants and does
6 not take into account the cumulative impacts of all
7 pollutants that are released from a single source, let
8 alone multiple industrial pollution sources.

9 From a public health perspective, it is
10 unacceptable to assess cancer and non-cancer risk
11 pollutant by pollutant. Cancer risk is additive, yet
12 the proposal does not require operators to aggregate
13 cancer risks from the same source. This could allow a
14 single source to have a significant adverse health
15 impact on nearby residents already exposed to risks
16 from other sources. Looking to cancer risks from
17 individual pollutants separately could significantly
18 undercount the overall health impacts and allow a
19 single source to cause an unacceptable high lifetime
20 cancer risk to Philadelphia residents.

21 The proposed high number for the acceptable cancer
22 risk benchmark would compound this even more. The
23 Board should require applicants to aggregate the
24 cumulative health impacts of multiple pollutants that

1 would be emitted by a facility to establish the total
2 cancer risk and also to combine non-cancer risk of
3 pollutants that affect the same organ or organ system.
4 Consistent with current science, EPA has set scientific
5 principles in its air toxics rules for combining risks
6 and will soon release new guidelines for analyzing
7 cumulative risks. This type of aggregation is already
8 being implemented at other permitting programs, such as
9 Oregon's Department of Environmental Quality, The South
10 Coast Air Quality Management District and The Bay Area
11 Air Quality Management District in California.

12 In addition, the Board should reduce the cancer
13 risk benchmark in the rule for when AMS requires risk
14 mitigation and for when the risk is too great and AMS
15 denies the permit. The Council recommends that the
16 board require risk mitigation plan when the combined
17 cancer risk of a proposed risk facility is 10 in a
18 million or more. AMS should deny a permit when the
19 combined cancer risk of a proposal is 25 in a million
20 or more.

21 Reducing the benchmarks is important to ensure the
22 Board's intended positive impact from this rule. The
23 proposed regulation should also be strengthened by
24 improving public participation, so the communities have

1 a chance to meaningfully participate in the risk
2 assessment process. The Board should ensure that the
3 residents will be able to get timely information about,
4 have input on, and have the opportunity to challenge a
5 risk assessment and mitigation plan for a facility that
6 affects their neighborhood.

7 The Board should also commit to reviewing and
8 responding to public comments to ensure they are
9 meaningfully considered in the final decision, when
10 possible.

11 The Board should also commit to review and
12 strengthen the rule as scientific updates occur, but at
13 least every five years. Again, the council appreciates
14 that the board has taken the necessary first steps of
15 considering the health risks from air toxics. By
16 straightening the rule, the board has the opportunity
17 to better protect the health of all Philadelphia
18 residents and demonstrate strong leadership on
19 environmental justice and clean air policy. We believe
20 that these four key recommendations are easy to
21 implement into the proposed regulation and could lead
22 to better health protections for the most vulnerable
23 Philadelphians. Thank you.

24 DR. PAVAL-NELSON: Excellent. Thank you so much.

1 You were right under time. I appreciate that. I'm not
2 sure if Ms. Tammy Murphy has joined and would like to
3 speak since she was not available in the order. Also,
4 if other attendees that have joined would like to
5 speak, please raise your hand if you're calling on the
6 phone, after all the comments are provided, we will
7 unmute you and give you an opportunity to speak as
8 well.

9 With that said, we're going to move to Ms. Amani
10 Reid from the Pennsylvania Interfaith Power and Light
11 and Power Interfaith Project, Ms. Reid.

12 Okay, I don't believe Ms. Reid is on anymore, so we
13 will move to...

14 MR. SELASSIE: She have some problem connecting to
15 video. He is there.

16 DR. RAVAL-NELSON: Okay, I don't - Amani Reid?
17 Okay, in the interest of time we will move to Marta
18 Gutenberg.

19 DR. BETTIGOLE: Sorry, Dr. Raval-Nelson there is a
20 message in the chat that Amani Reid is trying to figure
21 out how to connect to audio. Does somebody need to
22 unmute her?

23 DR. RAVAL-NELSON: Sure, I'm not seeing here in the
24 participant list that's the problem.

1 DR. BETTIGOLE: Yes, she is there.

2 DR. RAVAL-NELSON: Okay, I see you now. Apologies.
3 Again. You'll have 5 minutes to comment and at the 4
4 minute and 30 second mark, I will go ahead and politely
5 interrupt you. Thank you very much. Sorry, you
6 disappeared for a minute in the attendees list.

7 MS. REID: No. I want to apologize. I believe that
8 was my fault. So yeah, apologies and thank you so
9 much.

10 DR. RAVAL-NELSON: No worries, no fault -- you may
11 begin now.

12 MS. REID: Thank you. Good evening, everyone. my
13 name is Armani Reid. I am the Policy Engagement
14 Manager for Pennsylvania Interfaith Power and Light,
15 which is a community of work congregations, faith-based
16 organizations, and individuals of faith responding to
17 climate change as an ethical and moral issue. We do
18 this through advocacy, education, energy conservation,
19 energy efficiency stewardship, and the use of and
20 promotion of clean, renewable energy. I'm also a
21 Philadelphia resident. I've been a resident for four
22 years or so now. Predominantly was in North
23 Philadelphia, which is facing quite a bit of air
24 pollution.

1 We thank the Air Pollution Control Board for
2 holding this public hearing regarding the amendments to
3 the air toxics and risk assessments . And our
4 organization, along with organizations across the
5 state, are strongly supporting the decision to better
6 regulate toxic air pollution and to reduce cancer risks
7 from pollution which is being emitted by our facilities
8 in the city of Philadelphia.

9 A bit more about the organization, we're a national
10 religious response to the threat of climate change. And
11 we see climate change as a moral issue, one that
12 demands response from people of faith. We represent
13 members on the local, state, city level and national to
14 advocate for things like this. As well as legislation
15 that will increase energy efficiency, reduce air
16 pollution, reduce climate change as a whole, and the
17 impacts and injustices that there are.

18 As members of a common humanity we recognize the
19 impacts of climate change are now touching the lives of
20 those in the city and those least able to adapt. Being
21 part of this effort offers us the opportunity to care
22 for creation and put our faith into action and that is
23 why we're here representing today. Our unique message
24 is to focus attention on moral implications and

1 inequalities from climate change. And we urge you to
2 ensure that Philadelphia residents will be able to get
3 information about and have input on the risk assessment
4 and mitigation planning process first at a facility
5 affects their neighborhood community.

6 Once again, as a person of faith and young adult,
7 I'm concerned about the impacts facing our communities,
8 by (indiscernible) communities and the health impacts
9 from air pollution due to the fossil fuel industry. As
10 we know, Philadelphia has some of the highest cancer
11 rates in the country. We should not take that lightly.
12 We believe -- and I believe in holding the values of
13 human dignity conscious first and foremost. I believe
14 we need to protect our communities from the harms of
15 this air pollution and from climate change. And we
16 also need to speak on the root causes of these
17 injustices. And many neighborhoods in the city, low
18 income and communities of color are dealing with these
19 harmful emissions and other releases that putting them
20 at an increased risk.

21 This inequity and exposure is due to a long history
22 throughout the country and abroad through discriminatory
23 [sic] practices of other facilities. And I believe we
24 all deserve to live in a healthy community. Yet many

1 people in the country and more locally are at a greater
2 risk once again because of where they live, work and
3 play.

4 We urge you to require an assessment of chemical
5 impacts on human health of the multiple air toxics from
6 facilities in the city. And we believe that the
7 regulations must be strengthened and we're standing
8 with organizations across the state that believe the
9 Board should make the needed changes for the sake of
10 our health and future generations.

11 Once again, we're strongly supporting the decision
12 to better regulate toxic air pollution and reduce
13 cancer risk from pollution emitted by large industrial
14 facilities in Philadelphia. Thank you.

15 DR. RAVAL-NELSON: Thank you very much. Excellent.
16 Okay, next we have Marta Gutenberg. Marta, I don't see
17 you on the list but I don't know if you are one of the
18 four folks calling in.

19 Okay, we will move to Peter Furcht, if I'm saying
20 your name incorrectly I apologize. Peter and all of
21 the callers have been unmuted so you have the control
22 to unmute yourselves directly. If you're on the phone
23 either Marta or Peter.

24 MR. FURCHT: Hi, this is Peter. Good evening and

1 thank you for the opportunity to speak tonight. My
2 name is Peter Furcht. I'm a resident of Pennsylvania
3 or Philadelphia.

4 I am a chemical engineer and I have spent my career
5 in the chemical industry in the field of plant
6 modernization and process automation. While I'm a
7 member of a number of environmental and social justice
8 organizations tonight I am representing myself and I'd
9 like to thank lots of other people who didn't know
10 about this meeting.

11 Let's be honest do we really have anything new to
12 discuss this evening? The economics of pollution
13 control have been well understood for decades. How
14 much an industry pollutes is an economic decision,
15 period. Either an industry pays for the cost of
16 evading pollution or the communities surrounding the
17 facilities pay for the pollution, excuse me, with their
18 health and their lives. I ask you since industry is
19 not volunteering to pay the cost of pollution abatement
20 and the surrounding communities are not volunteering to
21 pay with their health and their lives. Who should be
22 forced to pay? The industry or the community? Where
23 should the line be drawn that says a community has to
24 pay X amount for the indirect cost of unabated

1 pollution, while the industry pays y amount to abate
2 their pollution? This is the real issue we are
3 discussing, and you are deciding.

4 Industry has made it pretty clear from the start of
5 the industrial revolution that they weren't and still
6 aren't willing to spend any money on pollution
7 abatement unless forced to do so. As far as most
8 industry management was and still is concerned the
9 local environment is their free dumping ground
10 regardless of the damage that dumping may do. In their
11 minds why pay to contain waste if they can dump it for
12 free?

13 It wasn't until the creation of the EPA and the
14 state and local regulatory bodies came into existence
15 that industry was forced to pay some of the cost of
16 containing or eliminating their waste. In most cases,
17 engineers know how to design a facility to pollute more
18 or less or to a very specific amount. It is a
19 management decision to decide whether or not the
20 engineers can spend the money to design and build the
21 equipment needed to abate the pollution. Yes,
22 pollution control does cost money. There's no arguing
23 that. It costs money to build the pollution abatement
24 equipment and it costs money to operate. Industry

1 representatives tell us the industry can't afford that.
2 It makes them uncompetitive. We've heard the arguments
3 over and over again while the management gets rich from
4 outsized salaries and bonuses.

5 There are options available to management to be
6 competitive like putting some of that bonus money
7 towards flex monetization, but I digress. For some
8 reason also, regulatory bodies such as the AMS often
9 side with industry and accept industry suggestions to
10 keep abatement requirements low and limit the cost
11 companies have to incur. Why is this? You do this to
12 the detriment of the communities in the wake of that
13 pollution who are forced to pay the cost of that
14 pollution in asthma, cancer and birth defects,
15 miscarriages and delayed cognitive development and
16 decimated property values, in stink and filth and
17 countless other quality of life issues and issues we do
18 not even yet understand.

19 It is time for this to stop. It must stop. I am
20 not expert enough to discuss many of the new proposed
21 regulations, but in general, it is time for the AMS to
22 require the sources of industrial pollution to strictly
23 control all their pollution and behave as responsible
24 corporate citizens. Period.

1 Regulations must be strengthened to ensure they
2 achieve meaningful health protections for all
3 Philadelphians. AMS must lower the health hazard
4 benchmark used to decide when to require a risk
5 mitigation plan or when to deny a permit. AMS must
6 require a risk mitigation plan when the combined cancer
7 risk of a proposed facility is at the very most ten in
8 one million. And I'm talking about a combined or
9 cumulative cancer risk, not one individual pollutants
10 risk.

11 AMS must be sure Philadelphians are able to get
12 information about and have input into the risk
13 assessment and mitigation plans planning process for
14 facilities that impact their neighborhood. AMS must be
15 sure they are updating regulations to reflect the
16 latest scientific knowledge. Lastly, the AMS must stop
17 siding with irresponsible industry management who only
18 care about their bonuses and force them to protect the
19 communities in which they operate.

20 DR. RAVAL-NELSON: You have 30 seconds, sir.

21 MR. FURCHT: Why should the community, why should
22 Philadelphians pay with their health, with their lives?
23 It is time to significantly strengthen air quality
24 regulations. Thank you.

1 DR. RAVAL-NELSON: Thank you very much. Okay, next
2 we have Matthew Page and we'll go ahead and make sure
3 we allow -- unmute you. You should be unmuted and you
4 will have five minutes to speak at the 4 minutes and 30
5 second mark I will let you know.

6 We have had additional speakers added. There's
7 going to be five additional speakers after our last
8 pre-registered speaker. Also, if you have joined and
9 would like to speak, feel free to please raise your
10 hand and we will record that. And don't worry, Mr.
11 Page, this is not eating into your time, I promise.
12 You will also have the opportunity to continue to
13 provide written comment until September 9, 2022 and
14 those comments may be sent to the same individual,
15 Benjamin.hartung@phila.gov.

16 Thank you, Mr. Page. You have five minutes -- time
17 starts now.

18 MR. PAGE: Thank you so much. I appreciate it. I
19 also appreciate the effort that all you have kind of
20 gone into developing this rule. I've been a regulator
21 for seven years. I'm a consultant now.

22 So let me start off. I represent Eco Energy
23 Distribution Services in Philadelphia. There's a
24 (indiscernible) source, but I have submitted written

1 comments, and basically we just have some concerns with
2 this revised regulation that could potentially impact
3 our operations. But I do realize air toxic regs, I
4 mean, Eco Energy is very much committed to the
5 environment. I'm kind of hearing a lot of other people
6 commenting and all that. And it's like industry does
7 really care about the environment. We've been working
8 with industry for about 25 years now, and they do care,
9 and Eco Energy cares. So, we appreciate the effort
10 that you have put into developing this new or amending
11 this regulation. But I have submitted some written
12 comments.

13 Quite frankly, I'm not going to go in those into
14 detail, but what I will say is that I noticed that
15 there was an FAQ document that was published by AMS in
16 July last month, and it mentions that Title V renewals
17 will have to go through a health risk assessment. And
18 the regulation, or the Appendix B only mentions initial
19 Title V permits. And I know that you guys can't give
20 any initial feedback, but if you can kind of clarify
21 that as soon as possible because we're working with
22 clients right now, that it's just initial and it's not
23 renewal permits for qualified sources.

24 I know you can't do it right now, but if you could

1 probably try to have an updated document make sure I
2 believe it's question nine mentions -- Yeah, it
3 mentions the -- renewals on question nine of the FAQ
4 document. So that's my only verbal comments. I would
5 appreciate it if the AMS can clarify that, because we
6 have to kind of plan out six to nine months in advance
7 for these renewal permits, and if we have to do health
8 risk assessment, that affects our budget and all that.

9 DR. PAVAL-NELSON: Thank you for your verbal
10 comments, Mr. Page.

11 MR. PAGE: That's it.

12 DR. RAVAL-NELSON: We will follow up with you
13 separately - we will not -- because we want to make
14 sure we allow everybody the opportunity to speak. We
15 had agreed at the beginning of the meeting we would not
16 have a dialogue back and forth, but we will follow up
17 with you. AMS will follow up with you next week.

18 MR. PAGE: Thank you so much. I appreciate it.
19 That's it.

20 DR. PAVAL-NELSON: You're welcome. Excellent. Our
21 next speaker is going to be Sage Lincoln with the
22 University of Pennsylvania Law School. And please note
23 that anyone that would like to have follow up from AMS
24 regarding a question, we will be sure to follow up with

1 you. Sage, I believe you're unmuted and give me one
2 second. I'm going to restart the timer here, and you'll
3 have five minutes starting now.

4 MS. LINCOLN: Great. Thank you so much. Good
5 evening and thank you for the opportunity to provide
6 testimony. My name is Sage Lincoln, and I'm a
7 Philadelphia resident and a law student in the city.

8 I grew up across the state in Pittsburgh, which is
9 a city very well known for its poor air quality and
10 I've had asthma since I was a child. Because of my
11 asthma, poor outdoor air quality can impact my ability
12 to breathe when doing outdoor activities that I love,
13 such as running in Cubs Creek and along the Schuylkill.

14 So, I would first like to thank AMS and the Air
15 Pollution Control Board for really taking a critical
16 step of considering health effects during the air
17 permitting process. This step is really necessary to
18 actually protect the health of all Philadelphia
19 residents, including myself. The proposed guidelines
20 also take a really important step of adding a
21 pollutants cancer risk from both the proposed facility
22 as well as the background risk. And this shows that
23 the board really understands that cancer risk is
24 additive and that health risks must be looked at

1 cumulatively.

2 However, in my opinion, AMR VI does not go far
3 enough and may still allow new facilities with really
4 large negative health impacts to be constructed in the
5 city. For example, by looking at health risk for each
6 pollutant separately, AMR VI does not follow the
7 current science and also fails to assess the cumulative
8 health impact that Philadelphia residents like myself
9 actually experience.

10 Facilities emit many different pollutants, and AMR
11 VI allows each individual pollutant from a facility to
12 create a cancer risk of up to 100 in one million. And
13 so, this means that under ARM VI, one facilities total
14 cancer risk could be much greater than 100 in one
15 million and that it might still receive a permit
16 despite this huge cancer risk.

17 According to the EPA, the total cancer risk from
18 refineries, which adds up the cancer risk from all
19 different pollutants, rarely exceeds a 100 in one
20 million, which goes to show that a 100 in one million
21 unacceptable benchmark is really far too high,
22 especially when looking at a single pollutant.

23 Because of this, AMR VI should be amended to look
24 at the total additive cancer risk from the entire

1 facility. But if the Board does decide to continue
2 looking at risk pollutant by pollutant, it must
3 drastically reduce what the unacceptable benchmark is
4 to something more like 10 in one million, because this
5 will actually protect Philadelphia residents as opposed
6 to allowing up to 100 in one million cancer risk per
7 pollutant.

8 In my opinion, other improvements are also needed
9 to the regulation. The community must have a
10 meaningful opportunity to comment on health risk
11 assessments and risk mitigation plans during the
12 permitting process, and it's not clear whether or not
13 this is guaranteed right now. The Board should also
14 commit to reviewing and revising this regulation at
15 least every five years. Additionally, the risk
16 mitigation plans must actually require facilities to
17 reduce their health impacts and install monitors.

18 Right now, it's not very clear what facilities will
19 be required to do under the risk mitigation plans. So,
20 these facilities might still be emitting up to 100 in
21 one million, creating 100 in 1 million cancer risk per
22 pollutant, and it's not clear what the risk mitigation
23 plans would be required to do to abate this. And
24 furthermore, these regulations really must account for

1 how much harmful air pollution, how much more harmful
2 it is to children and other vulnerable populations. I
3 still remember being a child and having the terror of
4 having an asthma attack, gasping for breath through
5 closed airways, being put on a nebulizer. And the new
6 AMR VI regulations should really strive to make sure
7 that no child in Philly develops asthma or suffers an
8 asthma attack as a result of air pollution in
9 Philadelphia.

10 Because of this, I urge the Board to strengthen the
11 regulations and consider this testimony and the
12 testimony of others tonight and in written comments who
13 live in Philly's overburdened low income and minority
14 communities, because those folks are the folks who have
15 experienced the negative health consequences of the
16 city's air pollution for far too long. And so, thank
17 you again for the time to speak tonight and I do hope
18 that you reconsider the regulations and strengthen them
19 and implement them as soon as possible. Thank you so
20 much.

21 DR. RAVAL-NELSON: Thank you so much. I really
22 appreciate it. I just want to clarify something before
23 we move to our next speaker that is going to be
24 Jonathan Chase. I just want to clarify that all of the

1 comments, including the comments that were made by Mr.
2 Page, all of these discussions and these comments, the
3 written comments, the verbal testimony, all of that is
4 going to be reviewed and transcribed by the Board.

5 Everyone's feedback to ensure transparent process
6 will be reviewed and assessed. When I said that we
7 would follow up next week apologies, it's going to take
8 time for us to get through all of the feedback in the
9 comments. So, there will be a written process involved
10 of the comments and discussion. So, I apologize if my
11 stock response is "I will get right back to you or I
12 will get back to you next week." So, apologies for
13 that.

14 But just to be clear, everybody's feedback,
15 everybody's comments are equitably valuable and that's
16 why we're having this process and we're all listening
17 and taking notes and we will provide full feedback and
18 transcription and review. So, with that, our next
19 speaker will be Mr. Jonathan Chase from Drexel
20 University Environmental Health and Radiation Safety.
21 So, Mr. Chase, you're up next. And once I see you on
22 the screen, we'll go ahead and start your timer at five
23 minutes.

24 MR. CHASE: Okay? Can you hear me okay?

1 DR. RAVAL-NELSON: Yes sir. And your timer starts
2 now.

3 MR. CHASE: Well, thank you very much for the
4 opportunity to speak tonight. Most importantly, thank
5 you for your time and efforts that you all put into
6 this and for everything that you guys do on a daily
7 basis. My name is Jonathan Chase. I'm the assistant
8 vice president of Environmental Health and Radiation
9 Safety at Drexel University. And I wanted to
10 respectfully request additional discussion regarding
11 the Section II, C.5 of the proposed changes from April
12 of this year 2022, also known as AMR VI.

13 The section that I referenced is in a list of
14 exemptions that were removed from previous iterations
15 of the code. This specific exemption is as, quote,
16 "incidental or minor sources, including laboratory
17 scale operations, fireplaces and household appliances,
18 cooking appliances, general comfort ventilation of
19 occupied spaces, house cleaning operations, residential
20 scale solvent use and pesticide application, and other
21 such sources or categories of sources which are
22 determined by the Department to be of minor
23 significance for the purpose of this regulation."
24 Similarly, this issue was discussed, and where the

1 exemption originally came from was the 1995 review of
2 the Clean Air Act when it was promulgated by the EPA.
3 And there's a response from the EPA in June of 1995
4 confirming that these sources are considered minor and
5 that the burden of compliance and enforcement
6 significantly outweigh the benefit from exempting these
7 minor sources.

8 So, I just wanted to go on record and ask for the
9 time and to discuss this point and to better understand
10 why this exemption was removed, the impact to both the
11 regulatory agency and the community and to further
12 discuss alternative options and or reinstating the
13 exemption. And that is all I have for tonight. I want
14 to thank you for your time. I give back remaining time
15 to the group.

16 DR. RAVAL-NELSON: Thank you very much, Mr. Chase.
17 And again, just so that everybody is aware, we're
18 accepting all of these comments, and everything will be
19 reviewed fairly and equitably.

20 Our next speaker is Mr. Maurice Sampson with Clean
21 Water Action. Please unmute yourself and once I see
22 that you're on the screen, I will go ahead and start
23 the timer.

24 Mr. Sampson?

1 MR. SAMPSON: Yes.

2 DR. RAVAL-NELSON: Okay, excellent. I will start
3 your timer now.

4 MR. SAMPSON: No, actually I did not intend to speak
5 tonight. I'm in listening mode.

6 DR. RAVAL-NELSON: Excellent, well, thank you for
7 that clarification. And with that said, we will move to
8 our next speaker, Ms. Lynn Robinson. Ms. Robinson, once
9 I see you on the screen, I will start your timer.

10 MS. ROBINSON: Good evening. Can you hear me?

11 DR. RAVAL-NELSON: Yes, we can. And you can put your
12 hand down if you'd like and then I will start your
13 timer now.

14 MS. ROBINSON: Great. Good evening. My name is Lynn
15 Robinson, director of Neighbors Against the Gas Plants,
16 retired Philadelphia public school teacher and resident
17 of Germantown. I want to be sure to express
18 appreciation to the Health Department for their
19 intention to strengthen AMR VI.

20 Up until now, I have developed little trust in the
21 Air Pollution Control Board when it comes to protecting
22 air quality or climate or health, because my only
23 experience with them in the last five years was to
24 witness how they prioritized industry. I attended an

1 Air Pollution Control Board meeting about a year or
2 more ago when the topic of changes to Air Management
3 Regulation VI was on the table. At the time, Joe Minott
4 of Clean Air Council was on the Board and he presented
5 a white paper advocating assessing cumulative health
6 impacts. He was not listened to as if he was speaking
7 a foreign language. Non burning and non-poisonous
8 technologies must be shifted into and burning natural
9 gas is not the answer to our energy needs and desires.
10 I mentioned desires because much of what we manufacture
11 ends up in the trash. Since Philadelphia incinerates
12 40% of our trash, we breathe most of the manufacturing
13 process and the incinerated commodities themselves.

14 So other people are covering crucial topics like
15 how to do a realistic health assessment. I just want to
16 go over some of the loopholes and exemptions in the AMR
17 VI documents that really, I believe, need to be rooted
18 out. In the amendments document, Section II notice
19 requirements, the first paragraph describes the
20 requirement for permitted facilities to give written
21 notice to AMS of their toxic emissions. In the past,
22 AMS has omitted toxics for gas burning sources in their
23 public notice. So, AMS needs to add to that paragraph
24 that it will be in compliance with PA Code 25, chapter

1 127.45(a), which means that the AMS will include toxics
2 in public notices in (a)(3), (a)(3) is crossed out, and
3 I feel it needs to be reinstated. It requires permitted
4 facilities to give notice to AMS about toxics that have
5 been added to the AMS list -- (a)(4) has two loopholes
6 that need to be closed. First, an applicant should be
7 esquire to identify the toxic air contaminants emitted.
8 It should not be a maybe, so please change the word may
9 to shall.

10 Second, the cross out needs to be reinstated. The
11 start date for air contamination should be provided to
12 AMS and to the public. And (a)(5), as far as I know,
13 needs to be reinstated. It requires that the applicant
14 provide a material safety data sheet that conforms to
15 US department of Labor OSHA requirements.

16 Page 89 is subsection (c) exemptions -- and to me,
17 that's the most egregious part of the document. Because
18 there should be no exemptions. Every permitted facility
19 should give notice to AMS about toxic emissions. By
20 having these exemptions, a state code is being violated
21 because all contaminants from minor sources have to be
22 posted in The Pennsylvania Bulletin.

23 But here's the two craziest ones. One is for
24 complex sources. Complex sources is exactly what it

1 sounds like. It's more than one source on one
2 property. That means you could have a synthetic minor,
3 a minor, a major all on one piece of property. And to
4 exempt them from noticing toxics is crazy.

5 The other one is number (4), any non Title V
6 source. That means its synthetic minors, which are
7 borderline major that are a major plant but have an
8 agreement to run under capacity, and that's not really
9 monitored. So, we're talking about a whole lot of
10 facilities that just don't have to report their toxic
11 emissions. That's not following state code either,
12 because they have to be reported in The Pennsylvania
13 Bulletin. There's also...

14 DR. RAVAL-NELSON: Ms. Robinson, apologies. You have
15 30 seconds.

16 MS. ROBINSON: Okay, there's four unacceptable
17 exceptions to health assessments in the technical
18 documents, and the worst one is for major gas burning
19 facilities up to 50 million BTU an hour.

20 Also in the exemptions page ten, section III.
21 Conditions of Approval, number 2, this language says
22 that the applicant, not the health department, will be
23 responsible for assessing health risks to the public.
24 The applicant has a conflict of interests, it should be

1 the health department. And last number 3 --.

2 DR. RAVAL-NELSON: Ms. Robinson, apologies, your
3 time is up.

4 MS. ROBINSON: Thank you.

5 DR. RAVAL-NELSON: So, you're welcome. Please send
6 the comments to the email address so that we can have
7 your full written testimony as well. We appreciate
8 that.

9 MS. ROBINSON: Great, thank you.

10 DR. RAVAL-NELSON: Thank you. Okay, we have next up
11 is Russell Hicks. So, when I see you on the screen, I
12 will go ahead and start the timer for you for five
13 minutes. Mr. Hicks?

14 DR. BETTIGOLE: He appears to be muted.

15 DR. RAVAL-NELSON: I -- just made sure you were
16 unmuted. Okay, wonderful. Okay, put your hand down,
17 sir, and your time will start now.

18 MR. HICKS: Thank you. My name is Russell Hicks, co-
19 chair of the POWER Interfaith Climate Justice and Jobs
20 Team, representing POWER's comment on the amendment to
21 Air Management Regulation VI on review health impacts
22 from new sources of toxic air contaminants tax.
23 Philadelphians deserve to have access to information
24 about health assessments, regular monitoring of air

1 quality and cumulative health impact analysis and other
2 analysis needed and performed on facilities in their
3 neighborhoods.

4 This rule should be updated more frequently as new
5 scientific information becomes available on hazardous
6 air pollutants. Residents shouldn't have to wait 40
7 years for regulations to catch up with science. We
8 also want to consider mobile sources of air pollution
9 such as vehicles, as well as stationary resources when
10 examining cumulative impacts. That's something that
11 came up in our permitting fight in Nicetown with a
12 Nicetown gas plant. Since the plant is located next to
13 a SEPTA bus depot and is very close to a major highway.

14 This amendment does improve on the previous
15 regulation, by more than doubling the number of
16 hazardous air pollutants that has been included. While
17 this is a positive change, this regulation should also
18 take into account that cumulative impact of exposure to
19 multiple hazardous air pollutants and the cumulative
20 impact of nearby sources that emit the same pollutants.
21 In particular, the facility wide health risk assessment
22 should be expanded to include all air toxins emitted
23 from all air pollution from all nearby sources instead
24 of just within the facility.

1 We want air screen and air modeling should also
2 take into account emissions of nearby facilities.
3 Apart from modeling, we also would like to see
4 continuous monitoring sites that sample hazardous air
5 pollutants and ultrafine particles across Philadelphia
6 in order to develop a better understanding of ambient
7 conditions, transient events and overall health impacts
8 from new facilities.

9 In addition to assessment and cumulative impacts,
10 we would like to see certain materials added to the
11 list, other ultra-thin particles that included in the
12 updated list of hazardous air pollutants and the
13 cumulative risk assessment. Ultrafine particles have
14 the ability to enter the bloodstream and cross the
15 blood brain barrier, leading to numerous adverse health
16 effects, including cardiovascular respiratory diseases.
17 These ultrafine particles have critical health impacts
18 and cumulative health risks. This air pollution has to
19 be monitored more, mitigated and possibly removed from
20 our living environment to ensure a livable future.

21 Thank you.

22 DR. RAVAL-NELSON: Excellent. Thank you very much,
23 sir. Our next person to speak will be Mitch Chanin.
24 Once I see you and my apologies if I'm mispronouncing

1 any names, but once I see you on the screen and
2 unmuted, I will go ahead and start your timer.

3 MR. CHANIN: Great. Can you hear me?

4 DR. RAVAL-NELSON: Yes, we can. I'm going to start
5 your timer and you may put your hand down. Excellent.
6 Thank you. Timer starts now.

7 MR. CHANIN: All right, thank you so much for the
8 opportunity to speak tonight and -- appreciate the work
9 that has gone into crafting the updated proposed
10 regulation. My name is Mitch Chanin. I'm a resident of
11 Northeast Philadelphia. I'm a member of POWER
12 Interfaith as well as a number of other organizations.

13 I fully support the additional recommendations from
14 POWER, Penn Future, Clean Air Counsel, Earth Justice -
15 really also appreciated the comments from Sage Lincoln
16 around strengthening some of the regulations in terms
17 of lowering thresholds, mandating cumulative health
18 impact assessment of multiple pollutants from the same
19 facility and from ambient sources nearby. The need to
20 look at cumulative impact of pollution through multiple
21 pathways.

22 I wanted to just bring a couple of other things
23 into focus based on my past experience engaging with
24 permitting around SEPTA's gas, fire, power plant in

1 Nicetown and other struggles. I want to echo that I
2 think it is important to examine the impact of mobile
3 as well as stationary sources. Vehicle traffic is one
4 of the leading sources of air pollution in
5 Philadelphia, and facilities are sometimes responsible
6 for vehicle traffic along with emissions from
7 smokestacks or other equipment on site. For example,
8 when we were challenging the permit for SEPTA's power
9 plant, there was no examination of the combined
10 emissions from the plant and the 300 plus diesel busses
11 that were serving the depot immediately adjacent. And I
12 think that's inappropriate not to consider the combined
13 impact of those multiple sources or looking at the
14 impact of traffic pollution from traffic in combination
15 with the impact of pollution from a new source.

16 In addition, kind of lifting up something that
17 Russell was talking about. There are currently no
18 regulations for ultrafine particulate matter. EPA most
19 recent review indicated that there wasn't sufficient
20 information to establish thresholds. The World Health
21 Organization determined the same thing, but that
22 doesn't mean that there isn't a problem. I'm very
23 aware that sometimes members of the public raise
24 concern about issues where I believe the preponderance

1 of evidence shows that there isn't a significant threat
2 to the public. But I don't think that's the case with
3 ultrafine particulate matter.

4 There's growing evidence of very serious health
5 impacts, including respiratory, cardiovascular impacts
6 on the nervous system, diabetes and cancer. Those
7 pollutants cannot be measured in the same way that
8 larger particulates can, according to the particle
9 mass. It's important to look at the number of
10 particles and the surface area. In the absence of
11 thresholds determined by the EPA or other larger
12 agencies, I don't feel 100% clear on what Air
13 Management Services should do. But I think when
14 reporting to the public about the potential impact of a
15 new source of pollution, to my mind it feels
16 irresponsible not to have any assessment or provide any
17 information about ultrafine particulate matter, even in
18 the face of uncertainty.

19 I don't know really what that means from a
20 regulatory standpoint. I don't know how to quantify
21 risks when the data is insufficient. But I feel given
22 the Environmental Rights Amendment in the state
23 constitution and the commitment of the city to promote
24 public health, it just feels irresponsible to ignore a

1 whole area of pollutants where there's growing and very
2 significant concerns. So, I would implore AMS to look
3 at some way to address that, even in the face of
4 significant uncertainty. Yeah, I think I'll leave it
5 there. I support the other comments that were made by
6 the health advocates and would really like to see --
7 I'd like to see AMS look at mobile sources and find
8 some way to address the significant and growing concern
9 about ultrafine particulate matter. And thanks very
10 much for the time.

11 DR. RAVAL-NELSON: Excellent. Thank you very much.
12 You came in right at the 4 minute 30 second mark. I
13 appreciate it.

14 We next have Katlyn Connor. So, Katlyn, once you
15 are unmuted and on screen, I will start your timer.

16 MS. CONNOR: Hello? Can you hear me?

17 DR. RAVAL-NELSON: Yes, we can. Wonderful. I'm going
18 to start your timer now.

19 MS. CONNOR: Thank you. My name is Katlyn Connor
20 and I am a concerned citizen in the East Falls
21 neighborhood of Philadelphia. I appreciate the
22 opportunity to be able to speak on AMR this evening.
23 I'm a volunteer with Penn Environment and lobby to pass
24 legislation in PA to reduce air and water pollution,

1 among other climate actions. I work at a small
2 business, Rabbit Recycling, to address the waste crisis
3 in Philadelphia.

4 Personally, I consistently strive to reduce my
5 environmental impact with low waste solutions. Pouring
6 so much effort into the fight against the climate
7 crisis can feel minimized when pollution caused by
8 corporations is unchecked. A specific example is the
9 explosion at Philadelphia Energy Solutions refinery,
10 which released toxic chemical hydrochloric acid into
11 the atmosphere. A study conducted by UPenn shows that
12 before the refinery explosion, PES accounted for 72% of
13 Philadelphia's toxic emissions. Additionally, PES had
14 violated the Clean Air Act's emission limits for nine
15 of the twelve quarters prior to its closure. Allowing
16 operations to continue without interference is a gross
17 environmental injustice considering that neighboring
18 communities are predominantly of color and below the
19 poverty line.

20 It is long overdue to hold commercial polluters
21 accountable for their deeply harmful actions. I am not
22 familiar with the specific details of AMR VI, but I
23 have heard comments tonight raising concern that the
24 revisions to AMR VI are not strong enough in tackling

1 the health impacts of air pollution.

2 I support the strongest regulations and echo the
3 former comments of everyone tonight. That's all I have
4 and thanks again for giving me the time to speak.

5 DR. RAVAL-NELSON: Thank you so much. All right,
6 next we have Cordon Fuller. Once you're on the screen
7 and unmuted, I will start your timer. I do not see
8 Cordon in the participant list anymore.

9 DR. BETTIGOLE: I still do, but muted.

10 DR. RAVAL-NELSON: Okay, let's see if we can find
11 you.

12 JIAZHEN LI: Cordon, please unmute yourself.

13 DR. RAVAL-NELSON: Cordon, you should be able to
14 unmute yourself.

15 DR. BETTIGOLE: Cordon just put in the chat, "I'm
16 just observing."

17 DR. RAVAL-NELSON: Okay, wonderful. So, we will go
18 to the next speaker, Lindsay Christinee. I'm thinking
19 I'm saying the name wrong, the last name wrong. But
20 Lindsay -- once you are on screen you've been unmuted.
21 Once you are on screen, we'll go ahead and start the
22 timer.

23 MS. CHRISTINEE: Okay.

24 DR. RAVAL-NELSON: Hello. Wonderful. We can hear you

1 and I will start your timer.

2 MS. CHRISTINEE: Okay, perfect. My name is Lindsay.
3 Christinee. I am a delegate for the Southeastern
4 Pennsylvania chapter, the Sierra Club, an environmental
5 organization with chapters in all 50 states, Washington
6 DC and Puerto Rico. I am also a mother and local parent
7 of my public school, George A. McCall.

8 First, I would like to thank the council and the
9 Board for taking the time to listen to the community
10 and representatives from various environmental
11 organizations advocating for the best interests of
12 Philadelphians. A lot of what I will say you have
13 previously heard today, such as the fact that the
14 American Lung Association ranked the Philadelphia
15 Reading-Camden Metro area among the top 25 most
16 polluted in the United States in terms of two of the
17 most common and dangerous ambient air pollutants
18 measured nationally. And also, as we've also heard
19 today, a lot of these impacts from poor air quality
20 disproportionately impacts communities of color.

21 For instance, Nicetown, which has a population that
22 is 75% African American and 24.5% white, has an
23 incident rate of 577 cancer cases per 100,000 residents
24 from 2012 to 2016, which is higher than the city's

1 average of 473. The other demographic that is
2 negatively impacted by poor air quality are children.
3 About 25% of children in Philadelphia have asthma,
4 which is higher than the national rate. Researchers at
5 the University of Pennsylvania have acknowledged that
6 increased levels of air pollution are a primary
7 contributor, especially in neighborhoods near
8 industrial sites. I myself fit into the statistics as
9 a black child who grew up during the '80s in the
10 suburbs of Philadelphia and I'm still dealing with the
11 health problems associated with asthma.

12 Additionally, Drexel University has also noted that
13 environmental toxins are among the various factors that
14 contribute to neighborhood disparities in cancer rates.
15 Taking all of these health risks into consideration, I
16 ask the council to please consider that currently the
17 threshold for contaminant means that any amount less
18 than threshold amount does not need to be reported or
19 considered when looking at health effects. But what
20 about the chemicals and the contaminants that must be
21 considered as potentially affecting our health when
22 they accumulate. I ask that you please do not wait
23 until a lot of these contaminants accumulate to be
24 harmful to our health. Please make stricter

1 regulations against air toxins and those that can
2 accumulate in the environment.

3 Also, in section III, I ask that this should not be
4 deleted. It should be improved that to inform all
5 facilities immediately and that the facility shall file
6 notice to the AMS within 30 days of emitting the new
7 contaminant. I also recommend that the AMS should give
8 notice to the public about the contaminant and give
9 notice to facilities and potentially to other
10 publications.

11 The other recommendation that I ask is that
12 currently the synthetic minor sources have no
13 obligation to report the TACs. Please consider that
14 facility must announce all contaminants when posting a
15 notice. I also ask that you include the communities
16 and some of these decisions to kind of give us the
17 options or better understanding about how these
18 adjustments will impact us as far as air quality
19 control and the potential health benefits.

20 I believe that a lot of these adjustments could
21 make Philadelphia a national leader in advancing
22 environmental justice and making us a more livable,
23 breathable and healthy city to live in now and in the
24 future. Again, I thank you for your time.

1 DR. RAVAL-NELSON: Excellent. Thank you very much,
2 Ms. Christinee.

3 Next we have Lisa Hastings. Ms. Hastings, when you
4 are able to unmute yourself and I see you on the
5 screen, I will start your timer and then we will open
6 it up to the phone calls to see if anybody that's on
7 the phone line would like to speak.

8 MS. HASTINGS: I believe I'm unmuted.

9 DR. RAVAL-NELSON: Perfect. I will -- give me one
10 second. I want to be fair to you and your timer starts
11 now.

12 MS. HASTINGS: My name is Lisa Hastings. I'm a
13 resident of Philadelphia and the environmental justice
14 chair for the Pennsylvania Legal Women Voters
15 Environment Committee.

16 While it is good, the department is acknowledging
17 that more toxic air contaminants harm public health,
18 the amendment to AMR VI, as written, does more to
19 enable AMS and polluters to look good while withholding
20 vital information from the public about toxic releases
21 and doing little to protect them. It needs to be
22 revised in many ways before it will help protect public
23 health.

24 Please develop meaningful thresholds in health risk

1 assessments as suggested by prior commenters and with
2 continued public input. However, even with these
3 improvements, this regulation is full of extreme
4 exemptions for polluters. It exempts polluters and AMS
5 from providing public information on toxic emissions.
6 It lacks methods for public review and input. It also
7 may have significant negative consequences for the
8 public, especially for people living in areas with
9 ongoing toxic pollution where there are no remaining
10 major sources. The regulation would exempt most
11 pollutant sources from even having to notify AMS of
12 their toxic emissions and exempt most polluters,
13 including all minors, synthetic minor, and even some
14 natural gas facilities that are large enough to be
15 major sources. The exemptions where even quite large
16 natural gas burning facilities was not included in the
17 body of the amendment, but while it was tucked into one
18 of the technical documents contained in an appendix.

19 The location of this large exemption for natural
20 gas polluters raises questions in itself. Under this
21 amendment, hazardous emissions that AMS is notified of
22 would be excluded from public notices, performance, and
23 plan approvals, which is also a potential violation of
24 state environmental law. Information AMS would require

1 from some, not all, permit applications relating to
2 their toxic emissions would instead be kept on file for
3 the public to come in and look at during business
4 hours.

5 This places an unfair burden on the public and
6 releases AMS's polluters from work. How does public
7 health benefit from not telling the public what toxins
8 they are exposed to? Especially in a permitting
9 project -- a permitting application where you're
10 supposedly asking for public review and comment. Also,
11 exempting every source except selected major sources
12 from this regulation also has other serious
13 consequences, especially for EJ communities like Graves
14 Ferry. Benzene levels around the old refinery,
15 continue levels that are higher than EPA's action
16 level, but the remaining facilities are considered
17 minor sources by AMS. AMS did not continue to require
18 fence-line benzene monitoring and new permits, even
19 though the public asked for it.

20 Under this regulation, they'll just be able to say
21 that there is no major source on the property and the
22 public would never know what they were exposed to or
23 what source it was coming from. This is convenient for
24 polluters, but not for the public. It would also enable

1 AMS to just ignore many toxic threats to public health
2 and the environment because the sources of the toxins
3 would be exempt from regulation, under this regulation.

4 This is the only toxic pollutant regulation AMR
5 has. Thus, AMS, which only enforces regulations, will
6 claim that it can't consider toxic contamination and
7 permitting for most sources, let alone require
8 monitoring or mitigation measures where toxins are
9 already high and high, because the permits do not
10 involve major sources that are covered under the
11 regular --

12 DR. RAVAL-NELSON: Ms. Hastings, Sorry, you have 30
13 seconds, Ms. Hastings. Thank you.

14 MS. HASTINGS: Okay. This amendment would let both
15 polluters and AMS off the hook and would keep the
16 impacted public in the dark, which would not protect
17 their health or the environment. The existing and
18 amended regulations need to be replaced with
19 regulations that better protect the public health and
20 the environment from toxic air pollutants, including
21 following all state public notice requirements, plan
22 approvals, and making them stronger.

23 DR. RAVAL-NELSON: Your time is up, Ms. Hastings. I
24 would suggest the additional information, please do

1 send it as a form of written comment, to Benjamin
2 Hartung at Benjamin.hartung@phila.gov.

3 We have an additional speaker, Coryn Wolk, or Ms.
4 Wolk. I apologize. When you are ready and on the
5 screen, you may unmute yourself. And when you are on
6 the screen, I will start your timer.

7 MS. WOLK: Hi. I have unmuted myself.

8 DR. RAVAL-NELSON: I apologize for the wrong
9 reference. Apologies.

10 MS. WOLK: That's fine. So, my comments today will
11 be a summary, and I do intend to submit written
12 comments. And I'm a longtime Philadelphia resident and
13 I'm also a graduate student at the University of
14 Delaware focusing on industrial pollution and climate
15 change. And my research includes comparing state and
16 federal toxic air pollution management and there are a
17 lot of flaws in the proposed regulations that I
18 appreciate AMS trying new things, basically, but for
19 example, one area I've been looking at is the South
20 Coast Air Quality Management District and who it seems
21 like some of these regulations or mis-regulation is
22 modeled after, and they have significantly stronger
23 regulations and oversight overall, and they still have
24 cancer hotspots and areas with community complaints

1 that take years to deal with.

2 For example, one site that I'm researching has been
3 under Health and Emission Study for over five years and
4 more detailed analysis that was only prompted by years
5 of public complaints of cancer, terrible odors,
6 headaches, issues of children being basically too sick
7 to pay attention in school that resulted in them
8 discovering a large amount of hexavalent chromium
9 airborne emissions coming from an unknown source, and
10 the facility in question is a Title V source.

11 But this is why more minor facilities should not be
12 exempted from this. If you don't know what's out there,
13 there's no way for -- if the major agency doesn't know
14 what the risks are, what's in the air, how are citizens
15 supposed to understand their risks or what they're
16 being exposed to or where their cancer may have come
17 from?

18 Also, I question why AMS used meteorological data
19 from 2010 to 2014, especially given that we're in one
20 of the most rapidly warming areas in the country. And
21 also for non-carcinogens AMS is using threshold science
22 and many non-carcinogens don't follow threshold theory
23 for harm. Many of them are individual or begin harm at
24 very low doses, so should be treated more like

1 carcinogens. And so I encourage AMS -- seems like
2 you're modeling some of this after other states to look
3 either to places that are looking more at the actual
4 dose response for different pollutants or do some of
5 your own science.

6 However, only burdening smaller facilities with
7 more reporting and more impact studies is not useful at
8 all if they are able to make up the numbers and there's
9 no enforcement and no actual verification. So instead
10 of - I'm not -- I advocate for more record keeping and
11 more disclosures however, that's not enough. AMS
12 really should be doing more air monitoring or requiring
13 it for a lot of these new rules for different
14 facilities, that they have fence-line monitors and that
15 data become public so that people can see the numbers
16 themselves as they change and verify that these
17 monitors are working properly, and that AMS actually
18 take action. Because we've seen over and over again
19 that for one time more acute incidents, AMS tends to
20 come in about 20 hours later take a measurement and
21 say, "Okay, well, within this 24 hours for a short term
22 exposure, 20 hours later, we didn't measure much. So
23 probably nobody was harmed by this." And this is a
24 pattern and even for places like PES, which, as people

1 have mentioned, no longer needs a Title V, when we know
2 that there's large amounts of benzene being emitted,
3 that data keeps being questioned over and over, and
4 there's no actual agreement and no enforcement.

5 So, I really encourage you to explain some of the
6 data that was used for building these and some of the
7 science are looking for best practices for them and
8 really strengthen more of the public data component and
9 actual verification and consider what you can do to
10 improve your actual enforcement, not just adding more
11 record keeping. Thank you.

12 DR. RAVAL-NELSON: Oops. I apologize. I was muted.
13 Thank you very much for your testimony. You were the
14 last registered speaker that rose a hand.

15 So, I want to go ahead and open up the opportunity
16 for our three folks that are on the phone. So, if your
17 phone number is 215-510-0-3392 or 302-893-7800 or 603-
18 770-3623, if you would like to speak now, I will ask
19 Jiazheng to unmute you, and if you would like to
20 provide testimony, please just state your number and
21 let us know that you'd like to provide testimony, and
22 then we will do it in orderable fashion.

23 Would any of the folks on the phone like to provide
24 any feedback or comment?

1 MR. LI: The number with 3623 is muted.

2 DR. RAVAL-NELSON: Great.

3 MR. GILES: Yes. Phil Giles. No comment. My name is
4 Phil Giles. No comments. Thank you.

5 DR. RAVAL-NELSON: Okay, thank you for attending.
6 Would any of the other two callers be interested in
7 providing any feedback or comment? There's a number
8 with a 302 and a number with a 215.

9 The 302 number, please. You've been unmuted. Feel
10 free to state your name and your organization and let
11 us know if you'd like to provide any comment.

12 Okay, and then the number 215-510-3392. If you'd
13 like to provide comment, please unmute yourself and
14 state your name and your organization.

15 Hearing none, at this point in the hearing. I would
16 like to go ahead and ask if there are any other
17 participants that would like to provide comments and
18 I'm seeing that there's three additional numbers that
19 are on the list. And if I have missed you, I'm going to
20 let Jiazheng state those numbers out loud and ask if
21 they have comment. I'll mute myself Jiazheng, and could
22 you ask the numbers?

23 MR. LI: Okay, I see 215-510-3392, and if you would
24 like to speak, please unmute yourself. Another number,

1 603-770-3623, if you would like to speak, please unmute
2 yourself.

3 DR. RAVAL-NELSON: Let us know that they're not
4 interested in speaking. Last number that I see is 302-
5 893-3800.

6 Okay, hearing no additional comments. I would like
7 to take this opportunity and share the email address
8 and once again about the details. And one of our air
9 pollution control board members is our Philadelphia
10 department of public health commissioner, and I would
11 like to open it up for her to provide some words.

12 But before we do that, we will be expecting --

13 DR. BETTIGOLE: I think we just lost Dr.
14 Ravel-Nelson. I'm guessing that she wanted to give the
15 email to send comments from last time. I also put it in
16 the chat that you can send comments to
17 Benjamin.hartung, H-A-R-T-U-N-G at phila P-H-I-L-A gov
18 G-O-V, also in the chat.

19 DR. RAVAL-NELSON: My apologizes. I lost the
20 connection.

21 DR. BETTIGOLE: You were guessing? I was guessing
22 you were just going to give the email address, Dr.
23 Raval-Nelson, but did you want to say something else?

24 DR. RAVAL-NELSON: No, the email address and we can

1 also ask and then they can put the email address in the
2 chat as well. And then Dr. Bettigole -

3 DR. BETTIGOLE: Yes, I did put the email address in
4 the chat, so it's there.

5 I just wanted to take a minute to thank you all for
6 spending your evening with us, for your really
7 thoughtful, incredibly well-informed comments and also
8 just for this dialogue. This is a time when a lot of
9 the reaction we get from the public is sort of either
10 yay or screaming. And this has been a really
11 thoughtful, very informative discussion.

12 So, I want to thank all of you who took part in it.
13 We do take your comments very seriously. We are
14 looking forward to reading through them. We will be
15 responding and posting that response publicly and that
16 will inform the eventual decision of the Air Pollution
17 Control Board and that decision will take place in a
18 public hearing which will be announced. We can also
19 put information where we post the results on that.

20 So, thank you so so much. Please get a chance to
21 relax this evening. We really do appreciate your help
22 and making our city a little bit healthier. So, thank
23 you. Have a wonderful evening.

24 DR. RAVAL-NELSON: --Thank you very much for all of

1 the work and the technical activities involved in
2 making this a successful public hearing. Everybody have
3 a great night.

C E R T I F I C A T I O N

I, hereby certify that the proceedings and evidence noted are contained fully and accurately notes taken by me in the foregoing matter, and that this is a correct transcript of the same.

STACY RAUB

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