

## Benjamin Hartung

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**From:** Deborah Fexis [REDACTED]  
**Sent:** Sunday, August 21, 2022 1:15 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

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Dear Benjamin.Hartung@phila.gov,

Thank you for your efforts to better regulate toxic air pollution and reduce cancer risks from pollution emitted by large industrial facilities in Philadelphia.

The proposed regulations must be strengthened to truly ensure they achieve meaningful health protections for Philadelphians. Making simple but important changes consistent with the current science will make a real difference in preventing cancer, birth defects, and other serious health impacts from toxic air pollution in our city - especially in neighborhoods already overburdened by industrial pollution.

AMS should require an assessment of the cumulative impacts on human health of multiple air toxics from a facility. It is not adequate to individually consider the impact of each known carcinogen emitted by a facility. It would be more protective to aggregate the total carcinogenic pollutants emitted by a facility to establish the total cancer risk.

In addition, Air Management Services (AMS) should lower the health hazard benchmark used to decide when to require a risk mitigation plan or to deny a permit. AMS should require a risk mitigation plan when the combined cancer risk of a proposed facility is 10-in-1 million or more. AMS should deny a permit when the combined cancer risk of a proposal is 25-in-1 million or more.

The proposed guidelines require that the risk mitigation plan “minimize” and “manage” the health risk posed, but appear not to require or ensure actual pollution or health risk reduction. The regulation should require the adoption of additional specific pollution control and reduction measures, such as fugitive emissions controls, hazard or chemical phase-out or elimination, community buffer requirements, and fenceline monitoring. Furthermore, any permit, plan or license approved with a risk mitigation plan should include requirements for emission measurement, air monitoring and reporting to ensure compliance. The plan should also include clear consequences for not following the requirements.

The proposed regulation does not provide for public input on health risk assessments or risk mitigation plans for facilities that affect surrounding communities. AMS should explicitly provide for public review and comment to ensure community feedback can be incorporated in a timely way into decisions about the permit, license, or plan.

The Air Pollution Control Board should commit to review the rule every five years, after public notice and comment to ensure it reflects the best available science and is strengthened as needed to protect public health, particularly the health of children and fenceline communities.

I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Deborah Fexis



## Benjamin Hartung

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**From:** Deirdre DeVine [REDACTED]  
**Sent:** Saturday, August 6, 2022 10:42 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Deirdre DeVine





## Benjamin Hartung

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**From:** Derek Menaldino [REDACTED]  
**Sent:** Friday, August 12, 2022 8:04 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Derek Menaldino



## Benjamin Hartung

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**From:** Ellen Franzen [REDACTED]  
**Sent:** Thursday, August 18, 2022 3:15 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Ellen Franzen



## Benjamin Hartung

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**From:** Fern Hagedorn [REDACTED]  
**Sent:** Tuesday, August 23, 2022 8:36 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Fern Hagedorn



## Benjamin Hartung

---

**From:** Florence Buckley [REDACTED]  
**Sent:** Monday, August 8, 2022 3:35 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Florence Buckley





## Benjamin Hartung

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**From:** Francis Fedoroff [REDACTED]  
**Sent:** Friday, August 5, 2022 10:12 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Dear Benjamin.Hartung@phila.gov,

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Francis Fedoroff



## Benjamin Hartung

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**From:** Gail Mershon [REDACTED]  
**Sent:** Monday, August 8, 2022 10:36 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Dear Benjamin.Hartung@phila.gov,

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The proposed regulations must be strengthened to truly ensure they achieve meaningful health protections for Philadelphians. Making simple but important changes consistent with the current science will make a real difference in preventing cancer, birth defects, and other serious health impacts from toxic air pollution in our city - especially in neighborhoods already overburdened by industrial pollution. Philadelphia has a terrible history that demonstrates we have had more than our share of these pollutants.

AMS should require an assessment of the cumulative impacts on human health of multiple air toxics from a facility. It is not adequate to individually consider the impact of each known carcinogen emitted by a facility. It would be more protective to aggregate the total carcinogenic pollutants emitted by a facility to establish the total cancer risk.

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Gail Mershon

[REDACTED]

## Benjamin Hartung

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**From:** Gayle Cowper [REDACTED]  
**Sent:** Monday, August 8, 2022 9:41 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Gayle Cowper



## Benjamin Hartung

---

**From:** Gretchen Lohse [REDACTED]  
**Sent:** Tuesday, August 23, 2022 10:17 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Gretchen Lohse





## Benjamin Hartung

---

**From:** Harrison Mace [REDACTED]  
**Sent:** Sunday, August 7, 2022 9:21 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Harrison Mace



## Benjamin Hartung

---

**From:** Heather Knizhnik [REDACTED]  
**Sent:** Monday, August 8, 2022 10:42 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Heather Knizhnik



## Benjamin Hartung

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**From:** Henry Frank [REDACTED]  
**Sent:** Saturday, August 6, 2022 10:33 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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The Air Pollution Control Board should commit to review the rule every five years, after public notice and comment to ensure it reflects the best available science and is strengthened as needed to protect public health, particularly the health of children and fenceline communities.

I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Henry Frank



## Benjamin Hartung

---

**From:** Jada Ackley [REDACTED]  
**Sent:** Saturday, August 6, 2022 8:01 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

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Dear Benjamin.Hartung@phila.gov,

Thank you for your efforts to better regulate toxic air pollution and reduce cancer risks from pollution emitted by large industrial facilities in Philadelphia.

The proposed regulations must be strengthened to truly ensure they achieve meaningful health protections for Philadelphians. Making simple but important changes consistent with the current science will make a real difference in preventing cancer, birth defects, and other serious health impacts from toxic air pollution in our city - especially in neighborhoods already overburdened by industrial pollution.

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Sincerely,  
Jada Ackley





## Benjamin Hartung

---

**From:** Jason Volpe [REDACTED]  
**Sent:** Friday, August 5, 2022 10:13 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Jason Volpe



## Benjamin Hartung

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**From:** Jay Tarler [REDACTED]  
**Sent:** Monday, September 5, 2022 1:27 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Jay Tarler



## Benjamin Hartung

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**From:** Jennifer Parkhurst [REDACTED]  
**Sent:** Wednesday, August 10, 2022 12:11 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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---

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Jennifer Parkhurst



## Benjamin Hartung

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**From:** Jennifer Valentine [REDACTED]  
**Sent:** Thursday, August 18, 2022 3:38 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Jennifer Valentine





## Benjamin Hartung

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**From:** Jessica Bellwoar [REDACTED]  
**Sent:** Monday, August 8, 2022 10:42 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Jessica Bellwoar



## Benjamin Hartung

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**From:** Jessica Krow [REDACTED]  
**Sent:** Saturday, August 6, 2022 3:45 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Jessica Krow



## Benjamin Hartung

---

**From:** Jill Turco [REDACTED]  
**Sent:** Monday, August 8, 2022 4:18 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Jill Turco



## Benjamin Hartung

---

**From:** Jim Black [REDACTED]  
**Sent:** Saturday, August 6, 2022 10:19 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Jim Black





## Benjamin Hartung

---

**From:** Joanna Ward [REDACTED]  
**Sent:** Saturday, August 6, 2022 11:54 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Joanna Ward



## Benjamin Hartung

---

**From:** John Johnson [REDACTED]  
**Sent:** Saturday, August 6, 2022 8:50 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
John Johnson



## Benjamin Hartung

---

**From:** Johnny Buckley [REDACTED]  
**Sent:** Tuesday, August 23, 2022 10:04 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
Johnny Buckley



## Benjamin Hartung

---

**From:** Joyce Packer [REDACTED]  
**Sent:** Tuesday, August 23, 2022 9:39 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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The proposed guidelines require that the risk mitigation plan “minimize” and “manage” the health risk posed, but appear not to require or ensure actual pollution or health risk reduction. The regulation should require the adoption of additional specific pollution control and reduction measures, such as fugitive emissions controls, hazard or chemical phase-out or elimination, community buffer requirements, and fenceline monitoring. Furthermore, any permit, plan or license approved with a risk mitigation plan should include requirements for emission measurement, air monitoring and reporting to ensure compliance. The plan should also include clear consequences for not following the requirements.

The proposed regulation does not provide for public input on health risk assessments or risk mitigation plans for facilities that affect surrounding communities. AMS should explicitly provide for public review and comment to ensure community feedback can be incorporated in a timely way into decisions about the permit, license, or plan.

The Air Pollution Control Board should commit to review the rule every five years, after public notice and comment to ensure it reflects the best available science and is strengthened as needed to protect public health, particularly the health of children and fenceline communities.

I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Joyce Packer





## Benjamin Hartung

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**From:** Judith Parker [REDACTED]  
**Sent:** Monday, September 5, 2022 8:33 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

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Dear Benjamin.Hartung@phila.gov,

Thank you for your efforts to better regulate toxic air pollution and reduce cancer risks from pollution emitted by large industrial facilities in Philadelphia.

The proposed regulations must be strengthened to truly ensure they achieve meaningful health protections for Philadelphians. Making simple but important changes consistent with the current science will make a real difference in preventing cancer, birth defects, and other serious health impacts from toxic air pollution in our city - especially in neighborhoods already overburdened by industrial pollution.

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Please strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Judith Parker



## Benjamin Hartung

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**From:** Julia Koprak [REDACTED]  
**Sent:** Monday, August 15, 2022 10:47 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Dear Benjamin.Hartung@phila.gov,

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Julia Koprak



## Benjamin Hartung

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**From:** Julie Shapiro [REDACTED]  
**Sent:** Tuesday, August 23, 2022 9:45 AM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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I urge you to strengthen this rule in the above ways to better protect public health and advance environmental justice in Philadelphia. Thank you for your consideration.

Sincerely,  
Julie Shapiro



## Benjamin Hartung

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**From:** K Danowski [REDACTED]  
**Sent:** Thursday, August 18, 2022 5:59 PM  
**To:** Benjamin Hartung  
**Subject:** Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,  
K Danowski

