

EXHIBIT 4 – Written Comments to AMR VI and its Exhibits

My name is Amani Reid. I am the Policy Engagement Manager Pennsylvania Interfaith Power & Light, a community of congregations, faith-based organizations, and individuals of faith responding to climate change as an ethical and moral issue through advocacy, education, energy conservation, energy efficiency, stewardship, and the use and promotion of clean, renewable energy.

We thank the Air Pollution Control Board (APCB) for holding a public hearing regarding the amendments to AMR VI (Control of Air Toxics and Risk Assessment).

PA IPL is the Pennsylvania affiliate of Interfaith Power & Light, a national religious response to the threat of climate change. We see climate change as a moral issue, one that demands a response from people of faith. We represent our members on the local, state, and national level to advocate for legislation that will increase energy efficiency, reduce our contribution to climate change, and respond to climate impacts and justice issues.

Pennsylvania Interfaith Power and Light, along with organizations across the state are strongly supporting the decision to better regulate toxic air pollution and reduce cancer risks from pollution emitted by large industrial facilities in Philadelphia.

As members of a common humanity, we recognize that the impacts of climate change are now touching the lives of those least able to adapt. Being part of this effort offers us the opportunity to care for creation and to put our different faiths into action in a meaningful way. Our unique message is to focus attention on the moral implications of climate change.

We urge you to ensure that Philadelphia residents will be able to get information about and have input on the risk assessment and mitigation planning process for a facility that affects their neighborhood and community. I am a person of faith and a young adult. I am concerned about my future and the impacts that are facing BIPOC communities every day and the health impacts from air pollution due to the fossil fuel industry. Philadelphia has some of the highest cancer rates in the country, and we cannot take that lightly. I believe in holding the values of human dignity and conscience. We need to protect our communities from the harm of pollution and climate change. We must speak to the root cause of these climate injustices.

Many neighborhoods, including low-income communities and communities of color, are located near the fence lines of industrial manufacturing or disposal facilities and subjected to harmful emissions and other releases that put residents at increased risk. This inequity in exposure is due to a long history of discriminatory practices in siting industrial and other facilities.

We all deserve to live in a healthy community. Yet many people who live in the U.S. are at a greater risk from toxic chemicals simply because of where they live, work, and play.

We urge you to Require an assessment of the cumulative impacts on human health of multiple air toxics from a facility. Among the U.S.'s ten largest cities, Philadelphia has the highest cancer rate by far and we should not take this lightly. Regulations must be strengthened. We are standing with environmental organizations across the state that believe the board should make the needed changes for the sake of our health, and future generations.

Once again, we are strongly supporting the decision to better regulate toxic air pollution and reduce cancer risks from pollution emitted by large industrial facilities in Philadelphia.

Thank you.

Benjamin Hartung

From: Brent Groce [REDACTED]
Sent: Monday, August 8, 2022 1:27 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.

Dear Benjamin.Hartung@phila.gov,

It is unacceptable to us all to be a leader in cancer rates. We have the pinnacle of Ed's and Med's in our city and we should be a leader in addressing cancer and other environmental hazards!

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.

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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 action on this.

Sincerely,
Brent Groce



From: [Brent Groce](#)
To: [Benjamin Hartung](#)
Subject: Amendments to AMR VI
Date: Thursday, September 8, 2022 12:11:09 PM

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

Dear Mr. Hartung,

I'm writing to let you know that I am disturbed by the proposed amendments to the current Air Management Regulations. What I take away from these amendments are that we are relaxing current regs that will allow more pollution, not less. Also, that we are comfortable permitting less oversight on polluting sources. Why would we do this? The evidence is stronger in every new study that pollution and air quality result in significant health impacts. These impacts not only threaten the health of individuals and neighborhoods but they result in negative economic impacts on those communities and nearby communities.

My takeaways from reading the amendments is that the following changes should be implemented to prevent a worsening situation.

- Exceptions to the rule are not justified and should be eliminated because **exempted facilities could most harm public health.**
- AMR VI and the Technical Guidelines must **add comprehensive provisions for public input** on the health risk assessments and risk mitigation plans as described in the comments. (see background)
- AMS should **use readily available scientific methods for calculating cumulative impacts** in health risk assessment.
- The **health department is obligated to** use its mandate and authorization to **protect public health** in accordance with city code and Article 1, section 27 of the PA Constitution- "...The people have the right to breathe clean air..."
- The **Health Department**, not the polluter, **should perform health risk assessments.**
- The **undue health risk benchmark** of 100-in-a-million could allow another refinery sized or larger source to operate without requiring mitigation. The cancer risk guideline benchmark for undue health hazard of 100-in-1 million must be reduced to 10-in-1-million, unless the Department assesses all cumulative health risks as described in the EJ/CAC comments, in which case it can be 25-in-1million. (see background)
- The original AMR VI contained a paragraph which **prohibited a facility from**

emitting more than the approved toxic emissions, but it has been crossed out. It should be reinstated.

- There should be careful adherence to reliable science, not the **suspect science** applied to some of these amendments:

- Newly created thresholds for toxins saying these toxins are safe under the threshold.
- Available modern science and techniques are rejected to calculate cumulative health impacts of toxic emissions from a facility in combination with background environment
- a dangerously high benchmark for "undue cancer risk" which is more than twice the current risks in Philadelphia today

- **Risk Mitigation plans must ensure pollution reduction and control.** “Case-by-case review” should not occur unless it is clearly defined. Solid and transparent benchmarks for mitigation action are needed to protect public health. Acceptable standards for mitigations should be defined and monitored with mandated consequences if the plan is not followed. More mitigation strategies should be added to the suggested list.

Respectfully submitted,

Brent Groce

[REDACTED]
[REDACTED]

Be well,

Brent

From: [William Carter](#)
To: [Benjamin Hartung](#)
Subject: Chamber of Commerce - Comment RE: Air Regulation VI
Date: Friday, September 9, 2022 2:34:00 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)
[Chamber Comment RE - Air Regulation VI.pdf](#)

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Please see attached.

Thank you.



WILLIAM CARTER

Vice President, Local Government Advocacy & Engagement

THE CHAMBER OF COMMERCE FOR GREATER PHILADELPHIA

200 South Broad Street, Suite 700, Philadelphia, PA 19102-3813

[REDACTED]

[REDACTED]

chamberphl.com



#GoodBizPHL



MEMORANDUM

Date: September 9, 2022

From: William Carter IV, Esq.
VP Local Engagement and Advocacy

To: City of Philadelphia
Air Pollution Control Board

Re: Comment on Air Management Regulation VI

We have recently been contacted by certain stakeholders regarding the imminent implementation of Air Management Regulation VI in Philadelphia. They are extremely concerned about the negative affect this regulation, as currently written, will have on the numerous manufacturers, chemical companies, logistics facilities, fuel storage, distribution terminals, food manufacturers and other small businesses in the chemical industry.

Additionally, it has been brought to our attention that stakeholder engagement in the process to this point has been minimal - other than with advocates for the regulation. As an example, the Pennsylvania Chemical Industry Council has informed us they were not communicated with or included in the planning and development of the proposed regulation.

Particularly post pandemic, the Chamber has been working hard to help Philadelphia recover, grow and prosper again. We have a vested interest in retaining as many employers and jobs in the city as possible. Therefore, we are respectfully requesting the City of Philadelphia allow for more time to work with industry and other stakeholders to advance a regulation that will adequately consider health, the environment, the concerns of the local industry and city's economic growth with minimal unintended negative consequences for businesses and residents.

Benjamin Hartung

From: Alan Ankeny [REDACTED]
Sent: Friday, August 5, 2022 11:34 PM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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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.

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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.

Alan E. Ankeny

Sincerely,
Alan Ankeny



Benjamin Hartung

From: Alexis Brzuchalski [REDACTED]
Sent: Tuesday, August 23, 2022 9:54 AM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,
Alexis Brzuchalski



Benjamin Hartung

From: Amanda Ruffner [REDACTED]
Sent: Monday, August 8, 2022 10:50 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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Sincerely,
Amanda Ruffner



Benjamin Hartung

From: ana montalban [REDACTED]
Sent: Monday, August 15, 2022 11:13 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,
ana montalban



Benjamin Hartung

From: Anna Tangi [REDACTED]
Sent: Saturday, August 6, 2022 7:41 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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Sincerely,
Anna Tangi



Benjamin Hartung

From: Annette Ballard [REDACTED]
Sent: Saturday, August 6, 2022 3:52 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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Sincerely,
Annette Ballard



Benjamin Hartung

From: Barbara Hoffman [REDACTED]
Sent: Tuesday, August 23, 2022 8:42 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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Sincerely,
Barbara Hoffman



Benjamin Hartung

From: Beatrice Zovich [REDACTED]
Sent: Wednesday, August 10, 2022 12:49 PM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,
Beatrice Zovich



Benjamin Hartung

From: Ben Levin [REDACTED]
Sent: Friday, September 9, 2022 11:22 AM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,
Ben Levin



Benjamin Hartung

From: Bonnie Eisenfeld [REDACTED]
Sent: Saturday, August 6, 2022 8:28 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.

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 their community. 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,
Bonnie Eisenfeld



Benjamin Hartung

From: Boris Dirnbach [REDACTED]
Sent: Saturday, August 6, 2022 10:47 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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Sincerely,
Boris Dirnbach



Benjamin Hartung

From: Brandon Robilotti [REDACTED]
Sent: Saturday, August 6, 2022 10:56 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,
Brandon Robilotti



Benjamin Hartung

From: Brandon Tubby [REDACTED]
Sent: Monday, August 8, 2022 10:33 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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Sincerely,
Brandon Tubby



Benjamin Hartung

From: C Day [REDACTED]
Sent: Tuesday, August 23, 2022 11:01 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,
C Day



Benjamin Hartung

From: Camille Orman [REDACTED]
Sent: Saturday, August 6, 2022 9:45 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.

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,
Camille Orman



Benjamin Hartung

From: charles reeves [REDACTED]
Sent: Monday, August 8, 2022 2:23 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,
charles reeves



Benjamin Hartung

From: Cindy M. Dutka [REDACTED]
Sent: Sunday, August 7, 2022 9:18 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,
Cindy M. Dutka



Benjamin Hartung

From: Claire Byrnes [REDACTED]
Sent: Monday, August 8, 2022 11:02 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,
Claire Byrnes



Benjamin Hartung

From: Claudia Salcedo [REDACTED]
Sent: Monday, September 5, 2022 8:54 AM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Dear Benjamin.Hartung@phila.gov,

Dear Mr Hartung,

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, 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!

Claudia

Sincerely,
Claudia Salcedo



Benjamin Hartung

From: Cody Cowper [REDACTED]
Sent: Monday, August 8, 2022 9:39 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,
Cody Cowper



Benjamin Hartung

From: Dana Dentice [REDACTED]
Sent: Tuesday, August 9, 2022 10:35 PM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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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, including myself and loved ones and neighbors. The risk of cancer is too great.

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.

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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,
Dana Dentice



Benjamin Hartung

From: Dana Weidig [REDACTED]
Sent: Saturday, August 6, 2022 8:38 AM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,
Dana Weidig



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Sent: Saturday, August 6, 2022 8:39 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.

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 their community. 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,
Daniel Adair



Benjamin Hartung

From: Daniel Safer [REDACTED]
Sent: Saturday, August 6, 2022 10:35 AM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,
Daniel Safer



Benjamin Hartung

From: David Schogel [REDACTED]
Sent: Friday, August 5, 2022 9:50 PM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,
David Schogel



Benjamin Hartung

From: David Szczepanik [REDACTED]
Sent: Saturday, August 6, 2022 7:01 AM
To: Benjamin Hartung
Subject: Philadelphia Air Management Regulation VI for Toxic Air Contaminants

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Sincerely,
David Szczepanik

