January 22, 2014

Robert M. Summers, Secretary
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230-1720

Re: NOx limits --MD Preliminary Draft Power Plant Regulations

Dear Secretary Summers:

Chesapeake Physicians for Social Responsibility (PSR) appreciates the opportunity to comment on the Maryland Department of the Environment’s (MDE) preliminary draft regulations dated December 11, 2013, on nitrogen oxide (NOx) emission limitations from coal-fired power plants in Maryland.

Chesapeake PSR is concerned about the harm to public health caused by NOx emissions. NOx is an important precursor to the formation of ground level ozone. Maryland has the worst ozone air quality in the East and some of the worst in the country. Even at relatively low levels, ozone may cause inflammation and irritation of the respiratory tract, resulting in breathing difficulty, coughing, and throat irritation, especially during physical activity. Ozone can also increase the susceptibility of the lungs to infections, allergens, and other air pollutants, worsen asthma attacks, cause new cases of asthma, and result in permanent lung damage. Research also indicates that ozone exposure may increase the risk of premature death from heart or lung disease.

In addition, NOx plays a role in the formation of particulate matter, which like ozone, can cause significant human health issues. NOx also reacts in the air to form compounds that contribute to acid deposition, causing lakes and streams to acidify. When NOx is deposited in water it can affect nitrogen cycles, contributing to nuisance growth of algae especially in coastal estuaries.

Because of the health and environmental issues caused by NOx emissions, we believe that Maryland needs to make an aggressive effort to reduce NOx emissions from all major sources, and that the approach proposed by MDE to
regulating NOx emissions from coal-fired power plants will help in this effort. Coal plants are the largest stationary sources of NOx emissions in Maryland. It is unacceptable that more than half of the coal plants in Maryland still lack state-of-the-art emission controls for NOx and that coal plants in Maryland with state-of-the-art emission controls routinely fail to operate these controls according to publicly available data.

MDE's proposed approach addresses these shortcomings. The preliminary draft regulations require that plants with state-of-the-art emission controls for NOx operate those controls commensurate with historically demonstrated control efficiencies. It also gives units without state-of-the-art emission controls two years to modernize their controls. Chesapeake PSR believes that this approach should be used to form the basis of the emission limits in the final draft rule.

Chesapeake PSR appreciates MDE's effort to address the public health issues caused by poorly controlled coal-fired power plants. We look forward to providing you with additional comments on the final draft rule.

Sincerely,

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