

Maryjoy Ulatowski

From: Caleb Colvin [REDACTED]
Sent: Thursday, August 31, 2023 9:27 PM
To: DPHAMS_Service_Requests
Subject: Comment -SEPTA Roberts Complex SMOP

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

To whom this concerns,

As a frequent SEPTA rider, I am begging you to not approve this permit. The power plant is a moral travesty and the epitome of environmental racism. It is unconscionable to be poisoning people like this in 2023 when there are alternatives.

Caleb Colvin
6145723486

Maryjoy Ulatowski

From: Calvin Smith [REDACTED]
Sent: Tuesday, August 29, 2023 1:13 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex OP17-000024

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 DPHAMS_Service_Requests@Phila.Gov,

Please increase the frequency of stack testing requirements for combined heat and power (CHP) units G-01 and G-02 at the Southeastern Pennsylvania Transportation Authority's (SEPTA) Roberts Complex in the Nicetown neighborhood of Philadelphia. Over 35,000 Philadelphians live within a mile of the Roberts Complex, 51% of which live under the federal poverty line and 83% of which are people of color. This is an environmental justice community that has the right to increased environmental protections.

In January 2022, during a required test of emissions from the facility's largest pollution source, CHP G-01, it was determined that one of the heat and power generation units was emitting pollution above the levels allowed under the facility's permit. The malfunction was repaired and the facility paid a fine. It is unknown how long this equipment was malfunctioning for and how much unpermitted air pollution was released over time.

This malfunction could have easily caused this facility to surpass the 25 tons per year (TPY) pollution limits for nitrogen oxide (NOx) and volatile organic compound (VOC) emissions. The City of Philadelphia currently does not meet federal ground-level-ozone (smog) standards and in its 2021 Air Quality Report, the City's Air Management Services concluded that smog is increasing in the city, raising the risk of respiratory damage and other health effects.

SEPTA is now seeking to renew this air pollution permit and the current stack testing frequency requirements are not adequate to ensure that the facility's NOx and VOC emissions are kept below permitted limits. The current air permit and proposed renewal only requires that the two heat and power generation units at the site be tested every 8,760 hours of operation or every 3 years, whichever comes first. That is not an adequate frequency to ensure that the facility complies with its emission limitations at all times.

Please increase air pollution monitoring and testing at SEPTA's CHP plant in Nicetown to at least quarterly.

Sincerely,
Calvin Smith
[REDACTED]
Philadelphia Area, PA 19124
[REDACTED]

Maryjoy Ulatowski

From: Carolyn Booker [REDACTED]
Sent: Thursday, August 31, 2023 4:39 PM
To: DPHAMS_Service_Requests
Subject: Comment on SEPTA Roberts ComplexSMOP

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Hello, my name is Carolyn Booker, I'm a long term resident of Tioga & help to facilitate a community garden there. I'm also affiliated with the Phila Co Master Gardener program & PHS. Our neighborhoods don't need a further onslaught of pollution.

As it stands our health is being detrimentally affected by it.

We need to control the situation as much as we can. We need the Health Dept to deny the renewal of the CHP Gas plant's permit.

Sincerely,
Carolyn Booker

[REDACTED]
Phila Pa 19140
[REDACTED]

Tioga-Hope Park & Garden
2000-08 W Tioga St.
Phila Pa 19140

[Sent from Yahoo Mail on Android](#)

Maryjoy Ulatowski

From: Catherine Blunt [REDACTED]
Sent: Tuesday, August 29, 2023 3:45 PM
To: DPHAMS_Service_Requests
Subject: Comment -SEPTA Roberts Complex SMOP."

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

To Whom It May Concern;

I writing as a native Philadelphian who still resides in this city. Protecting the air quality in our neighborhoods for now and for future generations is essential for the quality-of-life we wish everyone to have and be maintained.

Over the past decade (more or less), our city government and its institutions / agencies concerned with air quality have acquiesced to profit oriented systems which increase air pollution in Philadelphia, especially in neighborhoods that already have issues of growing neglect, poverty, and poor quality-of-life concerns. These areas and residents are being sacrificed for the convenience of profiting from releasing toxins into the air they breathe.

There are better and more environmentally friendly ways for SEPTA to provide for its service needs at / through Wayne Junction. However, this will only occur if the Philadelphia Government and its agencies refuse to be complicit in sacrificing this neighborhood and its residents to greedy profiteers.

It's time for Philadelphia to stand-up and for our citizens. Do not renew the policy that allows SEPTA to emit poisonous gases into that Wayne-Junction- neighborhood-environment and require SEPTA to explore and adopt non-greenhouse-gas operations for now and into the future.

Sincerely,
Catherine Blunt

Sent from my iPhone

Maryjoy Ulatowski

From: Charles Best [REDACTED]
Sent: Wednesday, August 30, 2023 11:10 PM
To: DPHAMS_Service_Requests
Cc: chubest@aol.com
Subject: Comment on SEPTA Roberts Complex SMOP

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I want to start by saying that I was registered to give testimony at the 7/27 public hearing. I was called on during the meeting, but you could not hear me. I attended via audio link. My phone was not on mute. You must have had me muted on your end. Maybe this is peculiar to audio links rather than video links. Maybe I missed some special instructions on how to connect. Before the next such meeting you might want to figure out what went wrong. If I can help let me know.

However, I am grateful for this opportunity to share my opinion on whether the permit to pollute for the CHP should be renewed.

SEPTA is not the only air polluter in the Roberts Complex area, but it is a major polluter in that area, which touches on East Falls, Germantown, Nicetown, and Tioga. However, SEPTA is what we're talking about today.

In fact, the air pollution cannot be contained in those aforementioned communities but impacts communities far and wide.

>MY OPINION> I want SEPTA to go back to their former practice of getting all of the electric power for the Wayne Junction Substation from PECO, and SEPTA should decommission the CHP and thus stop burning the gas for it. Thus the permit should NOT be renewed.

These are my comments to support that opinion, as well as some additional actions that I think SEPTA should take to improve the quality of life for Philadelphians:

1. SEPTA gets a substantial amount of funding from Harrisburg. I am aware that the CHP was built to appease lawmakers from Western Pennsylvania, who threatened that if SEPTA did not find a way to burn natural gas from the fracking fields of Western Pennsylvania, those lawmakers would vote down State funding that SEPTA depends on. In turn, the lawmakers were appeasing the fracking industry (their major donors) and a very few of their constituents.

2. BEFORE THE CHP, the Wayne Junction Substation electric power needs were extremely reliably served by PECO via redundant transmission lines. That connection still exists. (a) So there is no reliability improvement justification for switching from PECO to the CHP; (b) Based on my experience, I seriously doubt that it is cheaper for SEPTA to operate their own generating plant than to buy power from PECO; (c) Unlike a true CHP the one at Robert's Yard barely recycles any waste energy, so to say it is overall more efficient is a stretch; and (d) Generation of renewable energy is expanding quickly, so as the grid is powered more and more by renewable energy, over the next 10 years, so to will be SEPTA's operations, if they switch to PECO. Furthermore, regarding (b) above, I am quite sure that the price SEPTA pays for gas will increase substantially from what they pay now, when carbon taxes are added to the extraction and use of gas, which I am quite sure is coming. And also, regarding (c) above I WANT TO SEE THE CALCULATIONS AND ASSUMPTIONS that the EPA used to determine that running the CHP would be 41% better for the environment than getting power from the grid, as stated by the Chief Engineer at the public hearing. I am afraid SEPTA might be misleading themselves and the rest of us with that number.
3. There can be no question that the addition of this CHP a few years ago, to the air polluting mix already existent, added to the health problems that already overwhelmed the nearby communities. Even if the measurements and calculations of SEPTA and AMS show that the air quality in the adjacent communities is compliant with Pennsylvania and EPA standards, which I find hard to believe given the health problems in the community, there is no doubt that the CHP adds a considerable amount of pollution to the existing mix in a community that is already overburdened with health problems which could be traced to poor air quality. So it is not hyperbole to say that the result of point #1 above is that Philadelphians are being slowly poisoned to appease the fracking industry in Western Pennsylvania. The fracking industry is not paying a cent to treat those health problems. That burden falls to the individual victims and to all levels of government. The millions that SEPTA spent putting in the CHP would have been better spent suing the culpable lawmakers for using quid pro quo (a favorite GOP strategy) and dereliction of duty to Pennsylvanians.
4. The health impact is exacerbated during hot summer months when the most ground level ozone is created from the emissions from the combustion of fossil fuel, and on days when air quality is deemed unhealthy (codes orange and above).
5. I am wondering if there was an intentional or an unintentional breach of the terms of the original permit given that the allowable emissions were calculated based on 8068 hours of operation per year for CHP to be considered a synthetic minor operating plant. That is 28.8 days short of a year. I WANT TO SEE A REPORT published and available to the public that itemizes which hours each of the turbine-generators did NOT operate. Maybe there was a need for a citizens watchdog group to monitor the daily operation of the plant. SEPTA designated the CHP as a synthetic minor plant, which allowed them to skirt

requirements of a major plant. I think that might have been a bit disingenuous on the part of SEPTA, and it shows a lack of concern for the health of the surrounding community.

Additional actions that I think SEPTA should take to improve the quality of life for Philadelphians:

1. They must use their very considerable area of rooftops, parking lots, maintenance and substation areas, and vacant land, to install solar panels to generate power to be used on site and/or sold to PECO.
2. I believe the air quality at the Roberts Yard is currently estimated based on air modeling using the readings from air monitors located miles away. I question the validity of this practice. Therefore SEPTA must install accurate air monitors that continuously detect a broad range of toxic and greenhouse gas pollutants at the boundaries of the SEPTA facility, to get an accurate picture of the air pollution in the adjacent communities. As Mr. Chanin stated in the public hearing, the pollutants measured should include particulate matter down to ultra fine particulates (100 nanometers, UFP) because UFP most assuredly has negative health implications that haven't been quantified yet, and the EPA is studying how to define the limits. See the WHO suggestions on this topic. All of these readings must be easily accessible to the public very quickly, almost in real time. Transparency to the public is very important, as Dr. Tsou stated in the hearing.
3. SEPTA must consider bringing back the electric trolleys to replace the diesel buses on route 23, which includes much of Germantown Avenue. On that route, this might be a better solution to the problem of burning fossil fuel than using buses with heavy batteries that require frequent recharging.

Thank you for your attention,

Charles A. Best

[REDACTED] Jenkintown, [REDACTED] 19046

[REDACTED]

Maryjoy Ulatowski

From: My Man Cholly Cooper [REDACTED] on behalf of My Man Cholly [REDACTED]
Sent: Thursday, August 31, 2023 4:48 PM
To: DPHAMS_Service_Requests
Subject: Comment -SEPTA Roberts Complex SMOP

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Heath Commissioner Dr. Cheryl Bettegole, Deputy Health Commissioner Palak Raval-Nelson, Dr. Kassahun Sellassie

I am writing to ask you to please do all in your power to stop the proposed construction of the gas facility in Nicetown. As a long time resident of Germantown I am quite concerned about the polluted air environment in which we are trying to raise our families. This facility will make things even worse, which is typically the case in poor neighborhoods. It is also detrimental to our children's children and the generations to come; we should be moving to renewal energy sources instead of locking our families into more decades of fossil fuel contamination.

Please help. Please feel free to contact me for any additional feedback.

Respectfully,

Charles Cooper

[REDACTED]
Philadelphia PA 19144
[REDACTED]

Maryjoy Ulatowski

From: Christine Kramer <cjkramer9@hotmail.com>
Sent: Thursday, August 31, 2023 12:35 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex OP17-000024

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 DPHAMS_Service_Requests@Phila.Gov,

Please increase the frequency of stack testing requirements for combined heat and power (CHP) units G-01 and G-02 at the Southeastern Pennsylvania Transportation Authority's (SEPTA) Roberts Complex in the Nicetown neighborhood of Philadelphia. Over 35,000 Philadelphians live within a mile of the Roberts Complex, 51% of which live under the federal poverty line and 83% of which are people of color. This is an environmental justice community that has the right to increased environmental protections.

In January 2022, during a required test of emissions from the facility's largest pollution source, CHP G-01, it was determined that one of the heat and power generation units was emitting pollution above the levels allowed under the facility's permit. The malfunction was repaired and the facility paid a fine. It is unknown how long this equipment was malfunctioning for and how much unpermitted air pollution was released over time.

This malfunction could have easily caused this facility to surpass the 25 tons per year (TPY) pollution limits for nitrogen oxide (NOx) and volatile organic compound (VOC) emissions. The City of Philadelphia currently does not meet federal ground-level-ozone (smog) standards and in its 2021 Air Quality Report, the City's Air Management Services concluded that smog is increasing in the city, raising the risk of respiratory damage and other health effects.

SEPTA is now seeking to renew this air pollution permit and the current stack testing frequency requirements are not adequate to ensure that the facility's NOx and VOC emissions are kept below permitted limits. The current air permit and proposed renewal only requires that the two heat and power generation units at the site be tested every 8,760 hours of operation or every 3 years, whichever comes first. That is not an adequate frequency to ensure that the facility complies with its emission limitations at all times.

Please increase air pollution monitoring and testing at SEPTA's CHP plant in Nicetown to at least quarterly.

Sincerely,
Christine Kramer

Maryjoy Ulatowski

From: CYNTHIA AHMED [REDACTED]
Sent: Monday, August 28, 2023 9:14 PM
To: DPHAMS_Service_Requests
Subject: Comment on SEPTA Roberts Complex SMOP

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

Greetings,

My name is Cynthia, and I live within walking distance of the Roberts Complex, and I am absolutely OPPOSED to the renewal of SEPTA's SMOP.

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come.

As a resident of the Nicetown/19140, neighborhood, I am absolutely appalled at the statistics!! I was astounded to find out that my zip code has some of the highest rates in the entire city for asthma, cancer, and cardiovascular disease. There is no doubt in my mind that this facility is partially responsible for the air pollution.

I want the Philadelphia Health Department to deny the renewal permit for Roberts Complex as long as it includes the CHP (Gas Plant)! Short of that goal, I want AMS to improve the permit and provide more protection for my community's health!

Respectfully submitted,

Cynthia Ahmed
[REDACTED]
Philadelphia, PA. 19140

Sent from my iPhone

Maryjoy Ulatowski

From: Cynthia Gilman [REDACTED]
Sent: Tuesday, August 29, 2023 12:53 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex OP17-000024

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Dear DPHAMS_Service_Requests@Phila.Gov,

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Please increase air pollution monitoring and testing at SEPTA's CHP plant in Nicetown to at least quarterly.

Sincerely,
Cynthia Gilman

[REDACTED]
Philadelphia, PA 19130

Maryjoy Ulatowski

From: Daniel Safer [REDACTED]
Sent: Tuesday, August 29, 2023 4:37 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex OP17-000024

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Dear DPHAMS_Service_Requests@Phila.Gov,

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Please increase air pollution monitoring and testing at SEPTA's CHP plant in Nicetown to at least quarterly.

Sincerely,
Daniel Safer

[REDACTED]
Philadelphia, PA 19104
[REDACTED]

Maryjoy Ulatowski

From: Dan Jefferson [REDACTED]
Sent: Wednesday, August 30, 2023 2:52 PM
To: DPHAMS_Service_Requests
Cc: Susan Marcossan; WALTER SMITH; Macbook Owner; bob garber; David Craighead; Mary Preivity; Mary Watrus; jan widerman; Paul & Kathleen Selbst; Camilla Cell
Subject: SEPTA GAS POWERED ELECTRIC POWER PLANT AT THE ROBERTS YARD

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

Hello SEPTA.

At a time when climate change is becoming an ever increasing problem and threat to the world, every step must be taken to diminish the amount of greenhouse gas emissions that are going into our atmosphere and causing the global warming that leads to climate change.

As examples of how climate change has effected the Philadelphia area, consider the record temperatures which were recorded in the Philadelphia region this summer.

Also, consider how there was an unprecedented torrential downpour in Bucks County which resulted in a flash flood that swept away cars, right off a roadway, and resulted in the deaths of 7 people, including two siblings who were only 2 years old and 9 months old respectively. The force of this flash flood was so great that the body of the two year old was found 32 miles downstream in the Delaware River in Port Richmond. The infant was never found. Their mother was also drowned and died. This extreme downpour was the direct result of global warming which allows more water vapor to be held in the atmosphere and then released as torrential downpours.

The gas powered electric generating plant at the Robert Yard in Germantown is a prime source of greenhouse gases. It is no longer needed for electricity generation for the Wayne Junction trains, and it could be shut down without causing any problems, and it would reduce the amount of greenhouse gases being produced.

These same emissions are also a prime source of asthma and respiratory illnesses in the area of the Roberts Yard. Thus, now is the time to shut down the Roberts Yard Electrical Generation Facility.

It's 2:46PM of Wednesday, August 30.

I am sincerely, Dan Jefferson

Sent from my iPhone

Maryjoy Ulatowski

From: Parker, Darisha K. <DParker@pahouse.net>
Sent: Thursday, August 31, 2023 11:51 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex SMOP

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

Good evening, **Heath Commissioner Dr. Cheryl Bettegole, Deputy Health Commissioner Palak Raval-Nelson, and Dr. Kassahun Sellassie, (director of AMS).**

My name is State Representative Darisha K. Parker (198th), 4651 Morris Street and I'm writing as a supporter of Nix the Gas Plants organization. I'm writing as a neighbor, politician who represents the neighborhood of Nicetown.

As one of the over 500,000 Pennsylvanian's who suffers from asthma, I believe we need to do everything we can to reduce the air pollution that poisons us daily. I live 0.9 miles from Septa Powerplant.

I know that sometimes when I walk around my neighborhood, I feel that itch in my throat and the shortness of breath that indicates an oncoming asthma attack.

If we have an opportunity to reduce air pollution by any means, we should absolutely take advantage of that. Philadelphia is already sounded by six incinerators, which has led our city to be graded an F by the American Lung Association for our ozone quality.

Nicotown, specifically, has a higher pollution level than 78% of neighborhoods across the nation. There are over 22,000 cases of pediatric asthma in Philly – 31% of children living in the 19140 have asthma. That is 22,000 children whose lives are impacted daily by their environment.

It's clear that we need continuous air quality monitoring of this SEPTA plant and the surrounding communities. There are options to help this ongoing climate crisis, little things we can all do to protect our planet. But SEPTA have a chance to do something big and prevent thousands of Philadelphians from more health problems and they need to act now.

I strongly oppose the renewal of the permit. There's other options and we should do more to have a healthier environment.

Best regards

Rep Parker

State Rep. Darisha K. Parker
Secretary (PLBC)
Commerce, Aging & Older Adult, Insurance, Agriculture/Rural affairs
1335 W. Tabor Road

Suite 109
Philadelphia PA 19141
215-849-6426
717-210-1125 (mobile)
repparker@pahouse.net

Maryjoy Ulatowski

From: Darla Himeles [REDACTED]
Sent: Thursday, August 31, 2023 10:32 AM
To: DPHAMS_Service_Requests
Subject: Comment -SEPTA Roberts Complex SMOP.

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

To whom it may concern,

I write on behalf of my family to voice our condemnation of the Health Department renewing the permit for the SEPTA fuel plant in the Nicetown neighborhood of Philadelphia. Please stand with us and our neighbors. Do not permit this renewal to move forward: the plant is unnecessary, it poses health risks, and frankly, it is a classic instance of environmental racism.

My wife and I are both full-time administrators at Temple University, and we live in Germantown; this means that we commute through Nicetown regularly. Protecting Nicetown from environmental violence matters to us, especially when the plant is **unnecessary**. As you know, electricity is safer than natural gas, and SEPTA's regional rail has a more than adequate supply of electricity to run now and for the foreseeable future. Frankly, natural gas is a shortsighted energy solution that endangers lives and our earth for the sake of political capital. If SEPTA's needs are being met by electricity, it doesn't need natural gas. **Say no** to the permit renewal.

In addition, the **health risks** are not worth it: asthma, respiratory diseases, brain damage, cancer. My wife's parents both died of the same bone cancer because they lived in a neighborhood where poisonous chemicals were used for the unnecessary purpose of preventing weed growth. There is a classic American story: an environmentally horrible solution appears to solve a false problem, so those in power permit and invest in it; people get sick and die; way too late, those in power admit the solution was actually the problem and make changes. You represent a board that can repeal this permit before it is too late. **Say no**.

An important reason we ride SEPTA is to decrease our impact on the environment. According to SEPTA's sustainability page on its website, SEPTA aims "to create a more environmentally responsible, socially equitable, and economically prosperous Greater Philadelphia." That sounds nice and may be true in the abstract, but when it comes to economically poor neighborhoods, SEPTA seems more than willing to squeeze tight its eyes and commit environmental and health crimes against the low-income and mostly black residents who live there. This is unconscionable. We depend on leaders like you to hold the line against **environmental racism**. The Civil Rights Act of 1964 protects minority populations from this kind of bullying and harm. Stand up. **Say no to the fuel plant permit renewal**.

Thank you for welcoming letters from concerned Philadelphia residents. We appreciate your willingness to listen and trust you will use your position to ensure this permit renewal does not move forward.

Sincerely,

Darla Himeles, Betsy Reese, and Max Reese Himeles

[REDACTED]
Philadelphia, PA 19144

Sent from D's iPhone. Please excuse brevity and typos.

Maryjoy Ulatowski

From: David Szczepanik [REDACTED]
Sent: Thursday, August 24, 2023 4:30 PM
To: DPHAMS_Service_Requests
Subject: SEPTA's Midvale power plant is up for permit renewal

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

To whom it may concern:

My name is David Szczepanik and I am a resident of Grays Ferry neighborhood in Philadelphia. I am writing to urge the Air Management Service to monitor SEPTA's natural gas plant, and use this permit as an opportunity to model and enforce a transition toward renewable power on the site, and across Philadelphia.

As an occupational therapist working with homebound, recently hospitalized Philadelphians (currently primarily in 19140 and 19120), I see the ways poor air quality days negatively affect our high-risk neighbors and of this power plant.

Every day I work with neighbors negatively affected by pollution across this city. Many elders/seniors/neighbors living with congestive heart disease, COPD and chronic kidney disease have increased healthcare costs when they have exacerbations of respiratory symptoms. They have more difficulty on hot weather days without air-conditioning. These health effects are made worse by pollution. SEPTA's Nicetown Power Plant is leading neighbors to have more frequent hospitalizations and increasing government healthcare costs.

Especially this summer seeing poor air quality alerts related to wildfires and record hot temperatures, we must limit climate change causing pollutants like those from the SEPTA power plant. Alternate solutions like renewable and battery storage exist.

Public transportation should be at the forefront of a just transition. The building of this power plant puts Philadelphia's already-fragile environment further at-risk generating and releasing an excess of heat in a heat island neighborhood.

According to the U.S. Environmental Protection Agency, Nicetown has a higher fine particulate level than 78 percent of neighborhoods across the nation, and more exposure to diesel exhaust than 90 percent to 95 percent of neighborhoods. In a 2012 report, the Philadelphia Health Management Corporation found that 31 percent of children living in the 19140 zip code were diagnosed with asthma – significantly higher than Philadelphia's city average of 23 percent.

Why should the residents of Nicetown further be subjected to pollutants through this gas plant? In the last 2.5 years, since SEPTA's CHP has been operating, neighbors have noticed a decline in air quality and an uptick in asthma and allergies, in both cool and warm weather.

I am requesting the Air Management Service and Department of Public Health take four key actions:

- Conduct portable analyzer tests at least monthly, alongside CEM Monitors in the power plant stacks and year-round VOCs, CO, and HAPs monitoring. AMS should install at least one permanent ambient air monitoring station in the residential community within 3 blocks of Roberts Yard that measures ozone, ozone precursors and other toxics. North Philadelphia is an

air quality monitoring desert. SEPTA should report data to the public as it is collected on the Health Department website.

- Given increasing ozone problems in our city and continued lack of compliance with the National Ambient Air Quality Standard for ozone in the Philadelphia region, permitted levels of NO_x, CO and VOCs must be decreased, rather than increased. AMS should require SEPTA to sharply reduce fracked gas burning during ozone season and any other code orange or worse air quality days, with an amendment requiring a reduction in total gas burning over the year.
- Add solar photovoltaics (solar PV) at this site, including the roof of the Midvale Bus Barn, and at other SEPTA properties connected to the grid, in order to sharply reduce the amount of fracked gas burned to produce electricity used at Wayne Junction and on site. This would improve SEPTA's energy resilience and reduce SEPTA's energy costs while opening up IJJA and IRA funding for the installation of solar arrays.
- Require SEPTA to plant trees on their property and on bordering sidewalks to help remediate NO_x and particulate pollution. The City Health Department should require that every air polluting facility take steps to compensate for their pollution emissions.

With these actions, the Air Management Service can take seriously its role, and move Philadelphia toward a more sustainable and just future. To stay the course is to continue the historic path of environmental racism against a vital neighborhood in the city.

Thank you for the opportunity to comment, and I look forward to this body moving equitably forward to allow transit to achieve all it can toward a more sustainable region.

Sincerely,

David Szczepanik OTR/L
Grays Ferry, Philadelphia

Maryjoy Ulatowski

From: David Steinberg [REDACTED]
Sent: Tuesday, August 29, 2023 4:04 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex OP17-000024

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 DPHAMS_Service_Requests@Phila.Gov,

Please increase the frequency of stack testing requirements for combined heat and power (CHP) units G-01 and G-02 at the Southeastern Pennsylvania Transportation Authority's (SEPTA) Roberts Complex in the Nicetown neighborhood of Philadelphia. Over 35,000 Philadelphians live within a mile of the Roberts Complex, 51% of which live under the federal poverty line and 83% of which are people of color. This is an environmental justice community that has the right to increased environmental protections.

In January 2022, during a required test of emissions from the facility's largest pollution source, CHP G-01, it was determined that one of the heat and power generation units was emitting pollution above the levels allowed under the facility's permit. The malfunction was repaired and the facility paid a fine. It is unknown how long this equipment was malfunctioning for and how much unpermitted air pollution was released over time.

This malfunction could have easily caused this facility to surpass the 25 tons per year (TPY) pollution limits for nitrogen oxide (NOx) and volatile organic compound (VOC) emissions. The City of Philadelphia currently does not meet federal ground-level-ozone (smog) standards and in its 2021 Air Quality Report, the City's Air Management Services concluded that smog is increasing in the city, raising the risk of respiratory damage and other health effects.

SEPTA is now seeking to renew this air pollution permit and the current stack testing frequency requirements are not adequate to ensure that the facility's NOx and VOC emissions are kept below permitted limits. The current air permit and proposed renewal only requires that the two heat and power generation units at the site be tested every 8,760 hours of operation or every 3 years, whichever comes first. That is not an adequate frequency to ensure that the facility complies with its emission limitations at all times.

Please increase air pollution monitoring and testing at SEPTA's CHP plant in Nicetown to at least quarterly.

Sincerely,
David Steinberg
[REDACTED]
Philadelphia, PA 19125
[REDACTED]

Maryjoy Ulatowski

From: David Jens Thomas Pedersen [REDACTED]
Sent: Wednesday, August 2, 2023 5:53 PM
To: DPHAMS_Service_Requests
Subject: Comments/testimony regarding the renewal of the Synthetic Minor Operating Permit (SMOP) for the SEPTA-Roberts Complex

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Dear Philadelphia Air Management Services:

Thank you for the opportunity to submit comments regarding the proposed renewal of the SMOP for the SEPTA-Roberts Complex. Despite not being a Philadelphian myself, I am concerned about the health and welfare of the people and animals within the affected area of the SEPTA-Roberts Complex, and so it is of great interest to me that the permit, if renewed, is written so as to minimize the facility's emissions as much as possible (including elimination where feasible).

Therefore, I respectfully ask that the renewed permit include at least the following additions and revisions:

- Because Philadelphia is located within a federal ozone NAAQS non-attainment area, the permit should include restrictions on combustion during the ozone season. This could include provisions such as reduced gas-consumption limits, the use of cleaner fuels, and so on. I would advise AGAINST the use of selective catalytic reduction (SCR) owing to the fact that it emits raw ammonia (which itself is a toxic air pollutant) and even makes emissions worse in some instances as demonstrated by a recent bus-retrofit trial in the United Kingdom (which was shelved after the tests showed increased emissions).
- There should be continuous emissions monitoring in all the combustion stacks rather than periodic sampling and/or portable monitoring.
- The use of offsets to avoid violations during the ozone season should be prohibited.
- Because of the relative lack of air monitoring in the region, AMS and/or PaDEP should install a permanent air-monitoring station within three blocks of the Roberts Yard that monitors ozone as well as ozone precursors and other common air pollutants (e.g. particulate matter and carbon monoxide). This monitoring station should be designed and configured to report as frequently as possible rather than the standard hourly-reporting scheme, as averaged reporting can miss short-term spikes and mislead people into thinking that the air isn't as polluted as it actually is.
- Solar panels should be installed on the roofs of the bus barns to reduce natural-gas consumption and lower operating costs.
- Trees and other air-filtering vegetation should be planted around the facilities and within the general region.

The key point here is to take all practical measures to minimize (and, where possible, eliminate) air emissions, as there is no safe level of air pollution and the NAAQS do not reflect what science says about air pollution and the health and welfare of people and the environment.

Thank you for the opportunity to weigh in and enjoy your evening,

David Pedersen

Saanichton, British Columbia, Canada

(778) 677-2809

Maryjoy Ulatowski

From: Debbie Anderson [REDACTED]
Sent: Thursday, August 31, 2023 9:23 PM
To: DPHAMS_Service_Requests
Subject: Comment on SEPTA Roberts Complex SMOP

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Dear DPHAMS and AMS

My name is Debbie Morrall and resides at 2265 Yelland Street in the Nicetown district and I belong to Neighbors Against The Gas Plant. I am writing because I am deeply concerned about your approval of a renewal of SEPTA's Synthetic Minor Operating Permit (SMOP) for Roberts Complex, which includes SEPTA's Gas Plant. I strongly oppose your decision. The reason I oppose your decision to approve the renewal of SEPTA'S Gas Plant is because I fear for my family and my neighbor's health. I am very concerned about HAPS and TACS which cause cancer and central nervous system diseases. Pollution/air quality is already an issue in our neighborhood SEPTA's diesel bus that affects everyone including senior citizens and our children, who have underlying asthma, respiratory issues and heart issues. I cannot keep my house windows open without the smell of diesel. I am tired of being a prisoner in my own home. We have enough problems with Climate Change. I want to live and my community wants to live a healthy life. AMS, we need you to approve more protection for our community's health and stop approving permits for projects that will jeopardize our health.

Please provide a response to my letter. I would love to hear back from you on how you voted on this matter,

Thank you for consideration,
Debbie Morrall

[REDACTED] Philadelphia PA 19140
[REDACTED]

Maryjoy Ulatowski

From: Pronker the Rover [REDACTED]
Sent: Thursday, August 31, 2023 2:26 PM
To: DPHAMS_Service_Requests
Subject: Comment on SEPTA Roberts Complex SMOP

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Hello,

I am Denise Smith of East Falls, a long time resident. I was distressed to hear about the renewal of the license for this Synthetic Minor Operating Permit and Gas Plant.

This area has been the prey of many developments that have made it a dirtier and more congested area for its residents. I have seen green spaces and open spaces disappear at a frightful rate. To add more pollution that will effect the entire area is unthinkable. The air already smells when the wind shifts. This densely populated area can no longer support such toxins as the trees and open spaces cannot filter it and so it is held in and becomes a health threat to all who breath.

Please safe guard our health and peace of mind by denying this renewal.

Thank you,

Denise Smith

[REDACTED]
East Falls
Philadelphia, PA

Sent from [Mail](#) for Windows

Maryjoy Ulatowski

From: Denise Long [REDACTED]
Sent: Tuesday, August 29, 2023 6:11 PM
To: DPHAMS_Service_Requests
Subject: Comments on SEPTA Roberts Complex SMOP

Importance: High

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Denise Long
[REDACTED]
Philadelphia, PA 19140
[REDACTED]

Dear Philadelphia Department of Air Management Services and Mayor Kinny,

I am in total disagreement and opposed to placing a SEPTA Gas Plant in my community. Constructing a Gas Plant directly in a residential community is detrimental to the health of all residents and those who work and go to school near and far in the Wissahickon corridor. Furthermore, why was there no prior notification of zoning or a permit given to our community?

Thank you
Denise Long

Maryjoy Ulatowski

From: Dennis Barnebey [REDACTED]
Sent: Tuesday, August 29, 2023 12:42 PM
To: DPHAMS_Service_Requests
Subject: Comments - SEPTA Roberts Complex SMOP

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To the Commissioners,

I have lived in the Southwest Germantown neighborhood, not far from Roberts Ave., for over 50 years. I have witnessed many insults to our neighborhood due to neglect and disinterest from our public entities, However the Roberts Ave. gas plant, rises to the height of these insults.

During the initial round of hearings to grant approval, I watched, first in disbelief, then in amazement then in complete disgust as the SEPTA's arrogant lawyer, with support by our city, argued for its approval. SEPTA functions as an entity that is meant to serve the people of the city and region This was the complete opposite.

Even if the obvious health concerns are dismissed by hocus-pocus statistics due to poor monitoring and "wind patterns" (Really...a major bus depot, Roosevelt Blvd., a train yard and normal traffic on Wissahickon, Hunting Park and Roberts Ave. don't call into question air quality issues in a neighborhood with high asthma rates?), the City of Philadelphia once promised to move toward "zero-based emissions" in light of the extreme weather concerns caused by climate change. Clearly, a new gas plant has hardly helped meet that goal. Once again, words mean nothing. Actions speak much louder. And these actions, now renewing a plant which has no real purpose, is, yes, disgusting.

We know how to generate power without adding more pollution to already heavily-polluted air. Does it matter that it doesn't exceed some "standards" at distant monitors on specific days? It is common knowledge that Philadelphia's air is unhealthy. We had hoped that our city would be interested in improving things, rather than making them worse when the choice is possible. This, however, does not seem to be the case, especially when in a low-income neighborhood, once again. Reparations? Consider a non-renewal as minor start.

Please do not agree to renew this plant's permit. Side with the people who must endure the consequences not with profit-motives of those promoting it. This is the moment we must make the hard and critical choices to prove we want to save the planet and we who continue to live here.

As an addendum, I will add that, as a retired teacher, I have been leading a volunteer organization known as the Kelly Green Project, working to improve the quality and usefulness of the large schoolyard of our neighborhood elementary, John B. Kelly School. Among other things, we have created a school garden and a beautiful meadow both related to improving the urban landscape and restoring natural habitats. It would be great if our city leaders would join with us rather than work against us.

Thank you.

Dennis Barnebey
[REDACTED]
Philadelphia, PA 19144
[REDACTED]

Maryjoy Ulatowski

From: Diana Hulboy [REDACTED]
Sent: Tuesday, August 29, 2023 12:41 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex OP17-000024

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Please increase air pollution monitoring and testing at SEPTA's CHP plant in Nicetown to at least quarterly.

Sincerely,
Diana Hulboy
[REDACTED]
Philadelphia, PA 19128
[REDACTED]

Maryjoy Ulatowski

From: Donald Azuma [REDACTED]
Sent: Tuesday, August 29, 2023 2:57 PM
To: DPHAMS_Service_Requests
Subject: SEPTA Roberts Complex OP17-000024

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Sincerely,
Donald Azuma
19146