As Prepared for Delivery
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On
The U.S. Environmental Protection Agency
National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review
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May 9, 2023

Good morning,

My name is Bryan Burton and I am the manager of advocacy for healthy air at the American Lung Association. By taking bold steps through updating the Mercury and Air Toxics Rule, EPA has the opportunity to raise up the first generation of American children safe from mercury pollution since the dawn of the industrial revolution.

My mother suffers from advanced lung disease and her condition is the primary reason I came to work for the Lung Association. Each morning she must check the air quality on her phone before making her daily plans. This routine is repeated by millions of Americans across the nation. While seniors are particularly susceptible to the pollution from power plants, children are the most vulnerable and affected group by emissions of mercury and other airborne toxic chemicals.

Even low levels of methylmercury exposure can cause neurodevelopmental impacts. All too frequently, poor urban communities are the victims of environmental injustice by virtue of their proximity to centers of heavy industry, transportation and coal and oil fired power generation but research has shown that mercury can travel at least 30 miles from its source and much further than that via waterways.

Coal-fired power plants are by far the largest source of mercury pollution in America. The burning of lignite coal releases an especially high level of mercury and other air toxics and the regulation of this source is a significant step forward.

Dangerous pollution from coal fired power plants can also threaten important natural ecosystems. Not far from where I live stands the Brunner Island Electric Station, overlooking the main tributary of the Chesapeake Bay. By EPA's own reporting, Brunner Island's 2021 mercury emissions were 156% of 2020 levels, a significant increase. Utilization of available technologies allowed the plant to achieve a 31% reduction in 2022 Hg emissions while increasing heat input by 44%. Despite this commendable progress the work of cleaning up toxic emissions is not done as this power plant is scheduled to continue burning coal for at least another five years. Here and across the nation it is vital that EPA finalizes their proposed standard as soon as possible.

The Chesapeake Bay's six state, 64,000 square mile watershed is home to more than 18 million people and 3,000 species of plants and animals. It is also the source of Maryland Crab and many commercial fishing communities. Coal burning plants near waterways present a

significant risk of depositing Ionic mercury, Hg_2, which does not travel great distances, into the seafood supply.

Mercury exposure is often felt and identified over many years, rather than by sudden acute impacts that can immediately be connected with an obvious upwind source. This incremental emissions exposure adds to the risk for millions of people, so that even small additional risks spread over so large a population can result in a significant amount of cumulative impact on vulnerable groups.

Our current regulation of mercury from power plants has been the culmination of decades of deliberate and careful processes weighing scientific study with logistical challenges. The reductions in atmospheric mercury concentrations and deposits have been a tremendous success in the history of American environmental protection. Significant reductions in mercury and other air toxics have been tremendously effective in limiting the exposure of children to harmful pollutants. Efforts to curb the cost of these measures for the American consumer have been particularly advantageous.

The American Lung Association supports the most stringent possible standard for filterable particulate matter and urges EPA to finalize a standard of no higher than .006 pounds per million BTU. We applaud EPA for this proposal to further reduce dangerous emissions from coal- and oil-fired power plants and asks the agency to quickly finalize the strongest possible standards.

Thank you.