

As Prepared for Delivery
Comments of Diana Van Vleet
National Director, Outreach & Engagement, Healthy Air
American Lung Association
On
The U.S. Environmental Protection Agency
National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility
Steam Generating Units—Revocation of the 2020 Reconsideration, and Affirmation of the
Appropriate and Necessary Supplemental Finding; Notice of Proposed Rulemaking Docket ID
No. EPA–HQ–OAR–2018– 0794
February 24, 2022

Hello, my name is Diana Van Vleet and I am the National Director of Outreach & Engagement for the American Lung Association's Healthy Air Campaign.

I strongly support the Mercury and Air Toxics Standards created to clean up coal and oil-fired power plants, as well as the finding that these standards are appropriate and necessary. I urge you to set stronger standards to further protect kids from toxic pollution.

I live in the Capitol Hill neighborhood of Washington, D.C., and frequently run and walk by the Capitol Power Plant, which is less than a mile away from my house and just under two miles away from the EPA building. Every time I see this huge power plant, I am reminded of how incredibly lucky I am that this plant – which once burned tens of thousands of tons of coal every year – has mostly phased out its use of this incredibly dangerous fuel source. While this specific power plant has thankfully essentially stopped burning coal, there are many coal-burning power plants around the country that are churning out toxic, carcinogenic pollution that are harming health and even taking lives. This is not acceptable.

I am sure you will hear others today cover in more technical terms some of the many ways burning coals harms health, but I will put it very simply: we know, without a fraction of a doubt, that burning coal is really, really bad for the health of all human beings. Even healthy adults. We also know that the pollution resulting from burning coal is especially bad for pregnant people and babies – as burning coal results in mercury pollution, which is a powerful neurotoxin that permanently damages babies' brains. Lastly, while pollution from coal-burning power plants travels hundreds of miles and harms people living far away, the people who live near these plants are disproportionately harmed by this toxic pollution. And the people living near coal-burning power plants are often communities of color and low-income communities. Protecting these frontline communities from toxic power plant pollution is an opportunity to save lives and help advance health equity. And the good news is – we can do this!

Thanks to the Mercury and Air Toxics Standards, America's babies are healthier, and our air is cleaner. The Mercury and Air Toxics Standards are a success story. The standards have achieved major reductions in mercury emissions from power plants and cleaned up dangerous particle pollution at the same time. Power plants have already finished making investments to meet the standards, including installing pollution controls that are now in operation. The costs of MATS implementation are far lower than anticipated, and EPA's 2022 analysis shows that the benefits of cleaning up power plant

pollution far exceed the cost. Thank you for your proposal to fully restore these standards.

It is important to recognize the progress that has been made to clean up power plant pollution, but it is also critical to focus on the fact that power plants remain the largest domestic emitter of mercury and many other hazardous air pollutants. In the proposal EPA notes that power plants are the largest source of hydrogen chloride, hydrogen fluoride and selenium emissions, and are a major source of metallic hazardous air pollutant emissions including arsenic, chromium, nickel, and cobalt. Arsenic, chromium, and nickel have been classified as human carcinogens. Power plants are also a source of cadmium and lead, which are classified as probable human carcinogens. Our work to clean up deadly power plant pollution is NOT done, and we cannot stop until every American and every community has healthy air to breathe. It is time to strengthen power plant standards to further protect Americans from dangerous pollution.

More hazardous air pollutant reductions are achievable at minimal cost and will achieve important public health improvements for all, but particularly for those communities that bear the greatest pollution burden.

Thank you for your leadership with regards to restoring the finding that the standards are appropriate and necessary. Now, EPA must go further. I am very lucky that the power plant near my house has stopped burning coal and churning out toxic emissions. Many of my fellow Americans are not as lucky. No American, no matter where they live, should have to breathe cancer-causing pollution. Please set stronger limits on mercury and air toxics to fully protect our families.