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Comments of Katherine Pruitt National Senior Director, Policy 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

Good morning, my name is Katherine Pruitt. I am the National Senior Director of Policy with the American Lung Association. Thank you for the opportunity to speak today.

The American Lung Association strongly supports the cleanup of hazardous air pollutants from coal and oil-fired power plants. Cleaning up power plants is appropriate and necessary. I urge you to promptly finalize this rulemaking and to move ahead with setting stronger standards to further protect public health.

In 2011 the American Lung Association released a report titled *Toxic Air: The Case for Cleaning Up Coal Fired Power Plants*. In the report, one full page was devoted to a chart of the health effects associated with hazardous air pollutants emitted by power plants fueled by coal. Here are just a few of them that hit close to home for the Lung Association and for me personally:

- Acid gases, including hydrogen chloride and hydrogen fluoride, that irritate the skin, eyes, nose, throat, and airways.
- Mercury, that damages the brain, nervous system, kidneys and liver. It causes neurological and developmental birth defects.
- Lead, that damages the developing nervous system in children and adversely affects their learning, memory and behavior.
- Metals such as arsenic, chromium, nickel and selenium that cause cancer.
- Volatile organic compounds, including benzene, toluene and formaldehyde that also cause cancer, as well as irritating the eyes, nose and throat, impairing lung function and cognitive ability and causing harm to the liver and kidneys.

After our report was published, EPA adopted the Mercury and Air Toxics Standards in 2012 and we have been heartened to see some dramatic reductions in the levels of hazardous emissions that we were reporting on. The Mercury and Air Toxics Standards are a public health success story. EPA's proposal indicates that pollution reductions have been greater than was forecast in 2012. Mercury emissions are down 86% compared to 2010, much greater than the 75% reduction expected. Acid gases have been cut by 96% and non-mercury metal hazardous air pollutants have been reduced by 81%.

Still, despite the progress made, power plants remain the largest domestic emitter of mercury and many other hazardous air pollutants. This rule is clearly needed to continue to make progress in protecting all Americans from dangerous pollution, and especially those most vulnerable to harm. Babies and children, pregnant people, older adults, people with lung disease, heart disease or diabetes, people with lower incomes and people of color all face higher risk from these pollutants.

Cleaning up power plants is an environmental justice issue, and as such is a particular priority for the American Lung Association and for the Biden Administration.

People who live nearest the smokestacks have historically borne the brunt of these hazardous pollutants. For example, we know that acid gases tend to settle out of air emissions pretty quickly, within a day or two, posing high risk to neighborhoods and towns nearby. Mercury and sulfur dioxide emissions from power plants also have an immediate impact in the local area. So the people who live near power plants are disproportionately harmed by this toxic pollution. And the people living near coal-burning power plants are often people of color and people with lower incomes. Protecting these frontline communities from toxic power plant pollution is an opportunity to save lives and help advance health equity.

I want to take a minute to talk about cancer specifically, and the potential this rule holds as a cancer prevention strategy. Anyone who has had a loved one touched by cancer – including myself and likely almost all of us – comes away from that experience vowing to do what they can to prevent others from going through the same suffering. That drive inspired then Vice-President Biden to launch the Cancer Moonshot. In the early days of the Cancer Moonshot a Blue Ribbon Panel set out 10 recommendations for achieving the program's ambitious goals for cancer prevention, diagnosis, and treatment. One of those recommendations was to reduce cancer risk and cancer health disparities through expanding the use of proven prevention strategies.

Earlier this month, President Biden relaunched the Cancer Moonshot. The Moonshot includes the EPA Administrator in the Cancer Cabinet and specifically highlights addressing environmental exposures to prevent cancer and addressing health inequities. Reducing hazardous emissions from coal- and oil-fired power plants is clearly one of those proven prevention strategies. We know it works. I urge you to give the Administration this powerful tool.

EPA is right to restore the finding that the Mercury and Air Toxics Standards are appropriate and necessary. Now, the agency must go further. Even with these standards in place, coal-fired power plants still emit mercury, acid gases and carcinogenic toxic pollution. We call on EPA to set even stronger limits on mercury and air toxics to fully protect our families. Thank you.