

Comments from Liz Scott
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EPA Public Hearing on Repeal of National Emission Standards for Hazardous Air Pollutants:
Coal- and Oil-Fired Electric Utility Steam Generating Units
Docket ID No. EPA-HQ-OAR-2018-0794
As prepared for delivery

Good afternoon. My name is Liz Scott and I'm the Director of Federal Clean Air Advocacy for the American Lung Association. I'm here to appeal to EPA to withdraw this proposal. This proposed repeal is one of many actions that EPA is taking that will directly harm public health, and – this particular proposed repeal to weaken safeguards against mercury is incredibly disappointing.

I know you'll hear from dozens of speakers today recounting the many well-studied health harms of mercury pollution. Exposure to mercury can cause permanent damage to the brains of babies and fetuses. We're talking well-studied links between mercury and birth defects, low birth weight, developmental delays and learning disabilities. Adults are impacted too with studies showing damage to kidneys, the liver, brain and nervous system.

More than 80 hazardous air pollutants are released from fossil fuel-fired power plants. Nearly an entire science book's worth of harm – soot, carbon, chromium, cadmium, arsenic, lead - along with numerous toxic compounds like formaldehyde and benzene. These pollutants can cause cancer. They can cause cardiovascular disease and they can kill. To go a step further – exposure to this pollution can increase healthcare costs for individuals, leading to direct economic impacts, particularly for individuals and communities that live in close proximity to these power plants.

The good news is that since 2012 when EPA originally set and implemented the Mercury and Air Toxics standards, toxic air pollution has been dramatically reduced. Industry has already largely complied with these limits and mercury emissions are down 86% compared to 2010. Acid gas hazardous air pollutants have been cut by 96% and non-mercury metal hazardous air pollutants have been reduced by 81%. The 2024 rule that this EPA is seeking to repeal is projected to yield \$300 million in health benefits between 2028-2037.

The fact that this EPA is choosing to ignore all of this and proposing to increase health harms is disappointing and absurd. But what is really unacceptable is that this proposal would also repeal a requirement for continuous emissions monitoring. So not only would this lead to increases in deadly, harmful air pollution, it would also limit the availability of information on what emissions are occurring so the public can't even take personal steps to protect their health. Continuous emissions monitoring is more cost-effective than quarterly stack testing. Let me say that again – it is cheaper in the long run to run continuous emissions monitoring, and it is better for public health.

All of this is happening in the context of the administration offering unacceptable exemptions to power plants that simply sent an email asking to get out of complying with standards. This is not

what the law requires to allow exemptions. We have really turned the world upside down when the protection of babies and fetuses is not an important enough reason to enforce commonsense air pollution safeguards.

I strongly urge EPA to truly listen to all of the comments opposing this repeal and to ask if this repeal – if this increase in health harms for some of the most vulnerable among us paired with slowing down monitoring of emissions – is worth it. I hope you decide that it isn't and that this repeal is abandoned. Thank you.