

Comments of Liz Scott – As Prepared for Delivery
National Director, Advocacy, Healthy Air
American Lung Association
To
Environmental Protection Agency Public Hearing on Mercury and Air Toxics Proposal
February 24, 2022

Hello, my name is Liz Scott and I'm the National Director of Advocacy for Healthy Air with the American Lung Association. Let me start by saying that there were potentially more individuals who would have appreciated the opportunity to speak today who were not given a guaranteed speaking time because all available slots were filled before the deadline to register. The American Lung Association asked the Agency to open up additional hearing days to accommodate those who wanted to provide comments but was denied. In the future, we would hope that the Agency would allow public comments from anyone who registers before the deadline. In the immediate term, I will join my colleagues in trying to ensure the message from those who were not able to speak today is heard.

I support the proposal from EPA to reinstate the appropriate and necessary finding for the mercury and air toxics standards. I strongly support the standards to limit mercury and air toxics from power plants and urge EPA to set stronger standards to further protect health.

Part of this current proposal includes an approach called "totality-of-the-circumstances". This approach would require that *all* of the benefits of reducing hazardous air pollutants are examined, regardless of whether they can be quantified or not. The American Lung Association supports this approach. There are number of benefits – like the ability of children to play outside – that cannot necessarily be quantified. EPA doesn't have tools to quantify all the health benefits of reducing or eliminating exposure to dangerous pollutants either. The "totality-of-the-circumstances" approach better reflects the full picture of what we could see from a reduction in pollution.

The mercury and air toxics standards were a huge success when they were first implemented in 2012. By EPA's own estimates, the MATS standards were expected to prevent up to 11,000 premature deaths each year as well as 4,700 heart attacks, 130,000 asthma attacks and 5,700 hospital visits annually. It's clear that based on what we knew in 2016, EPA was well justified in finding the standards were appropriate and necessary. Since then, the evidence has only grown. It's now known that the impact of the MATS far exceeded what was originally forecasted in 2012. A Harvard University study found that the benefits of reducing mercury would actually total in the billions of dollars every year, not millions as was originally thought.

While we have made progress in cleaning up power plants, stronger standards are needed because power plants are still the largest domestic emitter of mercury as well as a periodic table's worth of hazardous air pollutants. Power plants can emit hydrogen chloride and hydrogen fluoride. They are a major source of arsenic, chromium and nickel – all of which have been classified as carcinogens. They also emit other carcinogens like cadmium, lead and selenium. Exposure to the hazardous air pollutants emitted from power plants is associated with chronic health disorders like irritation of the lung, skin and

membranes, decreased pulmonary function, pneumonia and lung damage. It can also have detrimental affects on the central nervous system and can damage kidneys.

There is good news when it comes to the costs of the proposal. In 2012, EPA estimated that the standards would cost \$9.6 billion annually to implement. EPA now indicates that the costs were far less than projected. In the proposal EPA now states that it overestimated the annual compliance costs by as much as \$4.4 billion. It is clear that the benefits of reducing mercury and other toxic pollution were undervalued and that the costs of reducing mercury and are toxics were significantly overestimated. Seems pretty clear that the benefits far exceed the costs here when it comes to protecting health.

We're appreciative that this process has moved forward after months of delay. We urge EPA to quickly finalize this proposal to reinstate the appropriate and necessary finding and to pivot towards proposing stronger standards so we can further protect health and reduce the preventable health harms from mercury. Thank you.