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**Testimony of Paul G. Billings
Vice President, National Policy and Advocacy
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**To the U.S. Environmental Protection Agency
On EPA Docket #EPA-HQ-OR-2009-0491
Federal Implementation Plans to Reduce
Interstate Transport
of Fine Particulate Matter and Ozone**

**Philadelphia, Pennsylvania
August 26, 2010**

My name is Paul Billings and I am Vice President for National Policy and Advocacy with the American Lung Association. Thank you for the opportunity to testify in support of a stronger Clean Air Transport Rule.

Dr. Al Rizzo has presented an overview of key lung health issues on behalf of our Board. The American Lung Association will also be providing extensive technical comments on the proposal. Today, I will simply emphasize a few key points.

First, the American Lung Association is pleased with EPA's decision to create a framework for setting emissions reductions under the "good neighbor" provisions of the Clean Air Act. Such a framework allows EPA to follow a strong, logical pathway forward. Under this framework, EPA assesses in detail the contribution from sources in each upwind state to the pollution levels in downwind states. Such a careful analysis provides strong evidence that pollution from these 31 states and the District of Columbia burdens people living in these nonattainment and maintenance areas. For example, at least 15 other states contribute to the air pollution problem in Pennsylvania; EPA's analysis indicates similar situations in many states. The EPA analysis is compelling evidence that to have clean and healthy air here in Philadelphia, we need clean and healthy air throughout the entire region.

EPA must move this framework forward expeditiously. Sadly, the standards that form the basis for the calculations are out of date. For PM, the proposal incorporates the 1997 and the 2006 PM 2.5 standards, which fail to protect public health. EPA is considering evidence that shows those standards should be revised and tightened next year. Most troubling is the use of the 1997 ozone standard as the basis of the proposal. Please allow me to put this 13 year old standard in perspective: My youngest daughter was born in 1997; next week she starts 8th grade. The ozone standard was revised in 2008. The 2008 standard, although tighter at 75 ppb, is also widely recognized as inadequate, is being reconsidered and will be replaced by the 2010 standard.

The ozone standard revision has been delayed until the end of October. I would be remiss, if I did not state our extreme disappointment with this delay and to remind EPA that delays in setting an ozone standard have serious and life-threatening ramifications. These delays in setting the standard translate into delays in putting clean-up measures in place that can reduce ozone and protect the health of millions of people. EPA can and should ameliorate some of the adverse consequence of the delay in the standard revision by moving forward with the most protective and strongest transport rule that maximizes pollution reductions. These reductions should ensure that no area is in nonattainment for the 1997 standard and should maximize the number of areas meeting the 75 ppb level.

As it is, the Clean Air Transport Rule is weaker than is needed to address the significant interstate air pollution transport, leaving areas like New York, Houston and Baton Rouge in

nonattainment or with maintenance issues for the 1997 standard. The proposal leaves many areas in nonattainment for PM including both Pittsburgh (Allegheny County) and Lancaster here in Pennsylvania, as well as New York City, Chicago, Cleveland, Detroit, and Houston. We urge EPA, therefore, to set stronger limits on air pollution. We urge that the limits should be 900,000 tons of nitrogen dioxide and 1.75 million tons of sulfur dioxide by 2014.

EPA recognizes that the national air quality standards evolve, changing as the scientific knowledge grows. And as standards are tightened, future transport rules will be necessary to address the interstate contribution to unhealthy air.

The Clean Air Transport Rule cuts some of the most widespread and dangerous pollutants in our nation. As proposed, this rule will save between 14,000 and 36,000 lives a year. We urge EPA to strengthen the rule to maximize the pollution reductions and the resulting health benefits. Thank you.