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American Lung Association Supports New Carbon Pollution Standards

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Statement of Paul G. Billings
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Good morning, I am Paul Billings, Vice President National Policy & Advocacy for the American Lung Association. The American Lung Association is pleased to support the U.S. Environmental Protection Agency's proposed standards for carbon pollution from power plants. This rule is setting the stage for the next generation of America's power plants to be the least toxic and most modern in the world.

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The American Lung Association believes that power plants should not be allowed to emit unlimited amounts of carbon pollution into the air. Scientists warn that the buildup of carbon pollution will create warmer temperatures which will increase the risk of unhealthy smog levels. Any increase in smog means more childhood asthma attacks and complications for those with lung disease.

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Addressing carbon pollution will help protect public health. Higher temperatures can enhance the conditions for ozone formation. Even with the steps that are in place to reduce ozone, evidence warns that changes in climate are likely to increase the risk of unhealthy ozone levels in the future in large parts of the United States. To protect human health, the nation needs strong measures to reduce climate change and ozone. The proposed standards for power plants are an important first step to address large stationary sources contribution to climate change.

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Ozone is a highly reactive gas that is a form of oxygen. Commonly known as smog, ozone is a pervasive air pollutant that forms in the atmosphere when hydrocarbon vapors react with oxides of nitrogen in the presence of sunlight and heat. The American Lung Association [State of the Air](#) report shows that more than 115 million of Americans live in areas where the air is unhealthy because of ozone air pollution. The report is based on the 75 ppb ozone standard, a standard that the science shows is clearly too high to protect public health. If President Obama and EPA had followed the law and the science, the ozone standard would be much lower – and more protective of more people.

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When a person inhales ozone, it reacts chemically with the body's internal tissues causing inflammation, like "sunburn," of the lung. Ozone acts as a powerful respiratory irritant at the levels found frequently across the nation. Breathing ozone may lead to serious harm to health, including:

- premature death;
- shortness of breath and chest pain;
- wheezing and coughing;

- inflammation of the lining of the lungs;
- increased susceptibility to respiratory infections;
- increased risk of asthma attacks; and
- increased need for medical treatment and hospitalization for people with lung diseases, such as asthma or chronic obstructive pulmonary disease (COPD).

Children who regularly breathe high levels of ozone may face reduced lung function in adulthood. Reduced lung function increases the risk of lung disease later in life.

Most at risk are:

- People with lung diseases such as asthma, chronic bronchitis and emphysema;
- Children—because their airways are smaller, their respiratory defenses are not fully formed, and their higher breathing rates increase their exposure;
- People who work or exercise outdoors;
- Adults 65 years old and older; and
- “Responders”—otherwise healthy individuals who experience health effects at lower levels of exposure than the average person.

In sum, ozone air pollution is a serious health threat that impacts millions of Americans.

We urge EPA to strengthen the carbon pollution proposal in several key ways.

To ensure the next generation of power plants is the most modern and least toxic, we urge EPA to adopt a tighter than 1000 lb/MwH CO₂ standard, reflecting achievements of the best performing plants in operation today.

We urge EPA to set a standard for simple cycle turbines.

We urge EPA to establish a firm “sunset” date for the alternative compliance mechanism option, excluding all plants built after a specific date. We urge strong enforcement provisions for those operators failing to meet either compliance option.

We will discuss all these issues in greater detail in our technical comments that the American Lung Association will file next month.

Finally, EPA needs to get to work on establishing a standard for existing sources. Anything less shortchanges our kids and shortchanges our health.

Thank you.

For media requests, please contact Mary Havell at mary.havell@lung.org or (202) 715-3459.