

April 16, 2019

The Honorable Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
William J. Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Sent via Regulations.gov  
Re: Docket ID: EPA-HQ-OAR-2018-0794

Dear Administrator Wheeler:

The undersigned health and medical professionals strongly urge you not to undermine or weaken the Mercury and Air Toxics Standards or the determination that the U.S. Environmental Protection Agency's (EPA's) actions on these standards were appropriate and necessary.

As professionals whose job is to safeguard the health of our patients and communities, we could not more strongly oppose any action to weaken these in-place, lifesaving standards. The cleanup of mercury, acid gasses, and carcinogenic volatile organic compounds under the standards remains a success story for public health and had been long overdue. The idea that the agency charged with protecting human health and the environment is considering undermining these lifesaving standards is nothing short of horrifying.

The Mercury and Air Toxics Standards are fully implemented and have successfully reduced dangerous emissions. However, their continued success depends on power plants continuing to run the pollution controls they already have installed. If the standards are undermined or weakened, coal- and oil-fired power plants could increase emissions that cause cancer, cardiovascular disease, neurological damage, asthma attacks and premature death.

A few of these many pollutants include:

- Mercury, a potent neurotoxin. Fetal exposure to methylmercury can cause devastating birth defects, including brain damage.<sup>i</sup>
- Arsenic, beryllium, cadmium, and other metals that cause cancer and may adversely affect the nervous, cardiovascular, respiratory and other systems.<sup>ii</sup>
- Acid gasses, which cause breathing problems and react to form deadly particulate matter.<sup>iii</sup>
- Dioxins, that include known carcinogens that also affect the reproductive endocrine and immune systems.<sup>iv</sup>
- Volatile Organic Compounds, which can cause short-term harms and react to form ozone pollution. Some such as benzene and formaldehyde are also carcinogens or probable carcinogens.<sup>v</sup>
- Other emissions, including directly emitted particulate matter.<sup>vi</sup>

- Sulfur dioxide, which is reduced alongside these toxic emissions as a result of pollution controls required by the standards. The Mercury and Air Toxics Standards prevent thousands of premature deaths each year by reducing this additional pollutant.<sup>vii</sup>

As health professionals, we are responsible for the health of the patients and communities we serve – but the quality of the air they breathe, which is absolutely critical to their health, is largely outside of their control. In fact, for babies and children, who are among the most vulnerable, it is completely out of their control. That’s why EPA’s work under the Mercury and Air Toxics Standards is so critical. The agency is the only organization with the power and the responsibility to safeguard the health of vulnerable Americans across the nation from these pollutants.

On behalf of our patients and communities, we call on EPA to continue fully enforcing the Mercury and Air Toxics Standards. Please abandon any plans to undermine or weaken these lifesaving protections. Any proposal that would result in power plants shutting off their pollution controls that prevent neurotoxins from permanently damaging babies’ brains is unacceptable. There can be no justification for any action to weaken this fully implemented, widely popular safeguard.

Signed,

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<sup>i</sup> Environmental Health and Engineering, Inc. 2011. *Emissions of Hazardous Air Pollutants from Coal-fired Power Plants*. Needham, MA, USA.

<sup>ii</sup> Environmental Health and Engineering, Inc. 2011. *Emissions of Hazardous Air Pollutants from Coal-fired Power Plants*. Needham, MA, USA.

<sup>iii</sup> Agency for Toxic Substances and Disease Registry (ATSDR). 2018. *Toxic Substances Portal: Toxicological Profiles*. Washington, DC, USA: ATSDR. Web Link: <http://www.atsdr.cdc.gov/toxprofiles/index.asp>

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<sup>v</sup> Agency for Toxic Substances and Disease Registry (ATSDR). 2018. *Toxic Substances Portal: Toxicological Profiles*. Washington, DC, USA: ATSDR. Web Link: <http://www.atsdr.cdc.gov/toxprofiles/index.asp>

<sup>vi</sup> Environmental Health and Engineering, Inc. 2011. *Emissions of Hazardous Air Pollutants from Coal-fired Power Plants*. Needham, MA, USA.

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