



March 8, 2019

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

Re: Comment Period Extension for proposed rulemaking – Docket No. EPA-HQ-OAR-2018-0794

Dear Administrator Wheeler:

The undersigned health and medical organizations respectfully request that the U.S. Environmental Protection Agency (EPA) extend the comment deadline for at least 120 additional days on the Proposed Revised Supplemental Finding and Residual Risk and Technology Review for the Mercury and Air Toxics Standards. We further request that EPA hold at least three additional public hearings on the proposal.

EPA's proposal holds significant potential to lead to changes in the way the Mercury and Air Toxics Standards are enforced and kept up-to-date in the future. The proposal also changes the standards' requirements for waste-coal facilities. Despite this, EPA did not release an updated Regulatory Impact Analysis with the proposal.

Further, the agency made its proposed determination on the basis of the 2011 Regulatory Impact Analysis. Multiple sources indicate that the cost and benefit estimates in this document did not match the ultimate costs and benefits of the rule, in part because scientific evidence that has emerged since 2011 shows that the benefits of reducing mercury emissions are much higher than were known previously.¹

1. Giang, A.; Selin, N. E. [Benefits of mercury controls for the United States](#). Proc. Natl. Acad. Sci. U. S. A. 2016, 113, 286; Sunderland, E.M.; Driscoll, Jr., C.T.; Hammitt, J.K.; Grandjean, P.; Evans, J.S.; Blum, J.D.; Chen, C.Y.; Evers, D.C.; Jaffe, D.A.; Mason, R.P.; Goho, S.; Jacobs, W. 2016. [Benefits of Regulating Hazardous Air Pollutants from Coal and Oil-Fired Utilities in the United States](#). [Environmental Science & Technology](#). 50 (5), 2117-2120. DOI: 10.1021/acs.est.6b00239.

This places a significant burden on parties commenting on the proposal to analyze for themselves the costs and benefits of the Mercury and Air Toxics Standards and the potential impacts of EPA's proposed revised supplemental finding. This burden justifies additional time to craft public comments in response.

We also request that EPA provide additional opportunities for public input in person. When EPA originally proposed the Mercury and Air Toxics Standards, the agency held public hearings in Chicago, Philadelphia and Atlanta. For this proposed reconsideration, EPA has only scheduled one public hearing in Washington, DC. It is critical that members of the public from across the country have the opportunity to weigh in on this proposal, including in the Midwest, which has experienced particular impact from mercury and other power plant emissions.

Our organizations request the addition of at least 120 days to the current public comment period, along with at least three additional hearings on the proposal. Thank you for your consideration of this request.

Sincerely,

Alliance of Nurses for Healthy Environments
American Lung Association
American Heart Association
Associations of Schools and Programs of Public Health
Children's Environmental Health Network
March of Dimes
Physicians for Social Responsibility