

American Lung Association • American Public Health Association • American Thoracic Society
• Asthma and Allergy Foundation of America •
National Association of County and City Health Officials •

May 9, 2014

The Honorable Gina McCarthy, Administrator
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
Mail Code 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: EPA-HQ-OAR-2013-0495

Dear Administrator McCarthy:

We write in support of strong standards to reduce power plant carbon pollution. These proposed standards can play an important role in reducing the risk of adverse health effects associated with ozone (“smog”) on our nation’s most vulnerable populations, including children, sick, and the elderly. These standards must be finalized for the U.S. Environmental Protection Agency (EPA) to take an important first step toward ensuring that electricity is produced by the most modern, and least toxic, power plants. Furthermore, we urge EPA to propose standards to limit carbon pollution from existing power plants.

The Clean Air Act requires the EPA to regulate air pollutants if they are found to endanger the public’s health. The Supreme Court ruled that greenhouse gases (GHG) met the definition of air pollutants in the Clean Air Act in 2007 and directed EPA to assess whether or not GHGs do endanger health. In 2009, the EPA found that concentrations of GHG in the atmosphere endanger the health and welfare of current and future generations by increasing temperatures and ozone pollution. This increase puts some of our nation’s most vulnerable communities at greater risk for their health.

To regulate a pollutant such as GHG, the EPA must list categories of stationary sources that cause or contribute to air pollution, which may adversely impact the public’s health or welfare. Electricity generating units (EGUs) are the largest stationary source of GHG in the United States. In 2012, combustion of fossil fuels for electricity generations was responsible for 32% of total GHG emissions.ⁱ Over 70% of our electricity comes from burning fossil fuels, mostly coal and natural gas.ⁱⁱ To regulate emissions from EGUs, the EPA must issue a new source performance standard (NSPS), which includes the achievable, best system to reduce emissions (BESR) considering cost and other factors. The proposed rule offers a NSPS for greenhouse gas emissions from electric utility generating units, commonly referred to as power plants.

As carbon pollution builds up in the atmosphere, scientists believe that it will likely lead to increased temperatures. The increase in temperatures can increase the risk of ground level ozone (or smog) formation.

Ozone is a colorless, odorless gas that reacts chemically (“oxidizes”) with internal body tissues, such as those in the lung. Ozone acts as a powerful respiratory irritant at the levels frequently found across the nation during the summer months. Breathing ozone may lead to shortness of breath and chest painⁱⁱⁱ, wheezing and coughing^{iv}; increased risk of asthma attacks^v; increased susceptibility to respiratory infections^{vi}, and need for medical treatment and for hospitalization for people with lung diseases, such as asthma or chronic obstructive pulmonary disease (COPD)^{vii} and premature death.^{viii}

The most vulnerable individuals, including children, teens, senior citizens, people who exercise or work outdoors, and people with chronic lung diseases like asthma, COPD, and emphysema, are most in danger of being sickened by ozone.^{ix} So-called “responders,” otherwise healthy individuals, who experience health effects at lower levels of exposure than the average person, are also susceptible to ozone.^x Children who grow up in areas of high ozone pollution may never develop their full lung capacity as adults. That could put them at greater risk of lung disease throughout their lives.^{xi}

Many areas in the United States produce enough ground-level ozone to cause health problems at levels currently found across the nation. The United States has worked hard since the 1970 Clean Air Act to cut ozone levels, and reduced them by 13 percent between 2001 and 2010, according to the EPA’s most recent trend analysis.^{xii} However, millions of people live in places that still struggle to meet standards set in 1987, including Los Angeles and Houston. And as the evidence clearly shows that the 2008 ozone standards fail to adequately protect public health, the challenge to provide air that is no longer burdened by unhealthful levels of ozone will continue for decades.

As EPA noted in their 2009 assessment of the impact of climate change on regional air quality in the United States, many studies “have demonstrated connections between meteorological variability and O₃ concentrations and exceedances, implying the possibility of climate change leading to increasing O₃ levels in some regions.”^{xiii}

The full impact of climate on ozone and other air pollutants is complicated. Science shows clearly that carbon pollution-fueled climate change will increase the challenge to meeting future national air quality standards for ozone. This “climate change penalty” will add complications going forward. The time to act is now.

The third U.S. National Climate Assessment underscores these challenges and more, noting that, “Climate change threatens human health and well-being in many ways, including impacts from increased extreme weather events, wildfire, decreased air quality, threats to mental health, and illnesses transmitted by food, water, and disease-carriers such as mosquitoes and ticks. Some of these health impacts area already underway in the United States.”^{xiv}

Because of the relationship between carbon pollution, climate change and degradation of air quality and other health impacts, we urge EPA to finalize this rule no later than June 1, 2015 and to propose standards to address carbon pollution from existing sources for immediate consideration.

Thank you for the opportunity to comment on this rule.

Sincerely,

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Citations

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