

Comments from
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On the
Proposed Revised Supplemental Finding for the Mercury and Air Toxics Standards and Results
of the Residual Risk and Technology Review

EPA Docket ID.: EPA-HQ-OAR-2018-0794

March 18, 2019

My name is Diana Van Vleet and I am the Director of Media Advocacy of the American Lung Association's Healthy Air Campaign. Thank you for the opportunity to speak to you here today.

Before I start, I would like to flag that on March 8, the American Lung Association and 6 other health and medical groups, including the American Heart Association and the March of Dimes, sent a letter to Administrator Wheeler requesting the addition of at least 120 days to the current public comment period, along with at least three additional hearings on the proposal.

The Mercury and Air Toxics Standards are a shining example of success when it comes to dramatically reducing many pollutants and protecting Americans' health. First envisioned in the 1990 Clean Air Act Amendments, the MATS rule took more than two decades to be adopted. Children born in those two decades did not get these protections the law promised. After some legal wrangling, these protections were finally put in place. Consequently, power plants have installed pollution controls, dangerous emissions have been greatly reduced, and people close by and far away are benefiting from cleaner air and less toxic pollution.

The standards reduce many different types of air pollution from power plants. Air pollution from coal- and oil-fired power plants contains more than 80 hazardous air pollutants identified by the Clean Air Act for control, including:

- Mercury. Mercury is a potent neurotoxin that permanently damages babies' brains. Mercury from coal-fired power plants is emitted into the air, falls into waterways, and accumulates in fish that families eat. Mercury causes permanent damage to the brains of babies – born and in utero- leading to developmental delays, learning disabilities and birth defects.
- Arsenic, beryllium, cadmium, and other metals that cause cancer and may adversely affect the nervous, cardiovascular, respiratory and other systems.
- Acid gases, including hydrogen chloride and hydrogen fluoride, which cause irritation to skin, eyes, nose, throat and breathing passages and react to form deadly particulate matter.
- Dioxins, that include known carcinogens that also affect the reproductive endocrine and immune systems.
- 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.

- 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.

While it is clearly unhealthy for anyone to be exposed to these pollutants, babies and children, pregnant women, older adults, and people with lung disease, heart disease or diabetes face higher risk from these pollutants.

Thankfully, the Mercury and Air Toxics Standards work. They have achieved a 90% reduction in mercury emissions from power plants, and cleaned up dangerous particle pollution at the same time. When the U.S. Environmental Protection Agency (EPA) adopted the rule, they estimated that MATS would prevent up to 11,000 premature deaths each year and prevent 4,700 heart attacks, 130,000 asthma attacks, and 5,700 hospital visits annually. What's more, a [recent analysis](#) out of Syracuse University found that mercury-related benefits of MATS are much larger than previously estimated, the actual costs appear to be substantially lower than projected by the EPA, and the total monetized benefits across all pollutants far outweigh the costs of the standards.

Further, the MATS enjoy far-reaching support. Electric utilities and senators in both parties urged EPA in 2018 to maintain the standards.

With all of the successful pollution reductions, dramatic health benefits, lives saved, support from industry and popularity among both parties in Congress, one must ask: why we are revisiting these lifesaving health protections? EPA wants to eliminate the “appropriate and necessary” finding, but claims that it can leave the regulations in place. **How one could argue that saving the lives of 11,000 Americans each year is not “appropriate and necessary” is beyond me.**

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.