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Docket No. EPA-HQ-OAR-2019-0282

Proposed Rule: Reclassification of Major Sources as Area Sources under Section 112 of the Clean Air Act

Good morning, and thank you for the opportunity to provide comments today. I'm Laura Kate Bender, national director of advocacy of the Healthy Air Campaign at the American Lung Association. I'm going to expand on the comments provided by my colleague Janice Nolen to further highlight the Lung Association's opposition to this proposal because of its harmful impacts to human health.

As my colleague pointed out, EPA has not provided a quantitative estimate of the health impacts of the emissions increases that will occur if this rule is finalized. We don't have complete information on the emissions from these facilities, and we don't yet have studies that quantify and monetize the increased cases of cancer, central nervous system dysfunction, or liver damage—just to name a few—that will result from this rule.

EPA did summarize the risks to human health from several, although not all, of the hazardous air pollutants under this proposal. The list is too long to have even been fully discussed in the Regulatory Impact Analysis. But EPA did include these:

- Benzene, a known carcinogen that causes leukemia, is frequently used in many of these facilities.
- Ethylbenzene is linked to respiratory and neurological effects and classified as a possible carcinogen, primarily produced in styrene production.
- Toluene is linked to central nervous system problems, including depression, tremors, impaired hearing and speech.
- Vinyl Chloride, linked to liver damage and found to cause cancer in the liver, is emitted in the production of PVC plastic and vinyl products.

EPA also acknowledges that many of these toxic emissions are precursors to ozone and particulate matter, and that the tools that reduce these hazardous air pollutants can also provide the co-benefits of reducing criteria pollutants. When it comes to particulate matter, EPA recognizes rightly that there is no threshold for harm, no amount of particulate matter that is safe to breathe. EPA also recognizes that it shortens human life, causes heart attacks, worsens asthma, causes coughing and difficulty breathing, and causes decreased lung function – among other expanding evidence of harm. What EPA's analysis did not include is that the World Health Organization has determined that particulate matter causes lung cancer as well.

EPA also describes the current understanding of the threats to lives and health of other well-studied pollutants that these hazardous emissions produce or contribute to: ozone, nitrogen oxides and sulfur dioxides. Collectively, these health threats include premature death, shortness of breath, asthma

attacks, cardiovascular impacts, low birth weight in newborns, and more. The populations that the Lung Association serves – including people with asthma, COPD, and lung cancer – at disproportionate risk of illness, hospitalization, and premature death.

While EPA has included these impacts in its RIA for this proposal, on balance, though, the analysis of the health impacts from reversing its decades-long policy of protecting health from toxic air emissions is far from complete.

However, EPA did calculate how much money this proposal will save for corporations – despite having limited data. EPA estimated financial benefits for each company by site based on a detailed facility-by-facility analysis for three different scenarios.

This lopsided analysis speaks volumes. It should go without saying that the fact that the cancer cases and other health impacts of these pollutants are difficult to quantify is not a reason to ignore them. Finalizing this rule would result in increased emissions of pollutants that cause premature death and life-altering impacts. And in the absence of being able to quantify how many more people will get cancer, require hospitalization, and die prematurely, EPA is proposing to move forward anyway. The calculus here is apparently that there is no amount of health costs possible that could outweigh the potential savings that industry could make by turning off their pollution controls.

Thank you again for the opportunity to provide comments on this proposal. We urge you, on behalf of the millions of Americans with lung disease and the many people who live downwind from the facilities that would increase their pollution under this proposal – do not finalize it into law. Thank you.