

Comments of Paul G. Billings
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On Proposals by the U.S. Environmental Protection Agency for:

Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units;
Revisions to Emission Guideline Implementing Regulations; Revisions to New Source Review Program
Docket EPA–HQ–OAR–2017–0355

October 1, 2018

Good morning. My name is Paul Billings and I am Senior Vice President, Public Policy for the American Lung Association. The American Lung Association is the nation's oldest voluntary health organization. Our mission is to save lives by improving lung health and preventing lung disease.

Since 1970, the Clean Air Act has dramatically improved the quality of the air we breathe. In 2011, EPA estimated that this landmark public health law will prevent 230,000 premature deaths in 2020. The proposed repeal of the Clean Power Plan would undermine this lifesaving progress. The proposed replacement before you today is WRONG and should be withdrawn.

One Thousand Four Hundred Premature deaths. Annually.

EPA's own analysis estimates that under this proposal, up to 1,400 people would die early every year starting in 2030. EPA's proposal would make the air dirtier, and would result in harm to the public health.

This same EPA analysis estimates that each year there will be up to 120,000 more asthma attacks and 64,000 more school absences due to the INCREASES in air pollution caused by the proposal.

And this is just scraping the surface. The EPA analysis acknowledges that the agency only quantified some of the additional adverse health consequences related to additional ozone and particulate matter. Missing from that analysis are consequences that EPA cannot quantify from these pollutants, like the increase in lung cancer caused by particulate matter. EPA did not calculate the health or economic costs of the increases in exposure to carbon monoxide, sulfur dioxide and nitrogen dioxide. EPA did not calculate the health impacts of exposure to toxic hazardous air pollutants including mercury, arsenic, hydrogen chloride or other hazardous air pollutants except to acknowledge that emissions of these pollutants will increase.

These hazardous air pollutants have significant health consequences. Mercury is a potent neurotoxin. Methylmercury accumulates in the food chain and leads to neurodevelopmental effects especially in children of women who consumed fish during pregnancy.

The rule would also provide less reduction of carbon dioxide that is driving climate change and impacting health today. Time is of the essence for the U.S. to curb releases of this pollutant in order to

avoid catastrophic damage. Consequently, there is a short window to act effectively to reduce those threats. The Clean Power Plan provides a powerful response. By contrast, this proposal fails that test.

In addition to rolling back the Clean Power Plan, EPA is also proposing to repeal important New Source Review provisions required by the Clean Air Act. The concept of New Source Review is very simple. When a facility is modified AND emissions increase, the facility must install and operate modern pollution controls. This provision is designed to make sure that pollution is controlled, and the public is protected.

EPA is proposing to repeal this provision and allow overall pollution to increase as long as the hourly rate of pollution doesn't increase. This would lead to increases of nitrogen oxides, sulfur dioxide, particulate matter and air toxics, including mercury, not only in the communities where the plants are located, but hundreds of miles downwind. Polluting power plants could operate more often and for more years into the future without having to install and run pollution controls.

This is absurd. In fact, it is so absurd that when it was tried more than a decade ago, the courts rejected it. EPA must not finalize the proposed changes to the New Source Review program.

The question for the agency could not be starker. Will EPA maintain the Clean Power Plan that promises to continue to reduce carbon dioxide that drives climate change and reduce toxic air pollution that causes asthma attacks, harms neurodevelopment, causes lung cancer and leads to premature death? Or is EPA going to choose to implement a replacement that will cost lives while throwing away the promise of cleaner air and a healthier planet?

To reiterate: The proposal before you today leads to more deaths – up to 1,400 additional premature deaths each year; more asthma attacks – up to 120,000 each year; and up to 64,000 missed days of school every year for our children.

I implore you to withdraw this proposal.

Thank you.