

Comments from Lyndsay Alexander, Assistant Vice President, Healthy Air Campaign American Lung Association

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

Good morning. My name is Lyndsay Alexander. On behalf of the American Lung Association, I am here to speak out against EPA's proposal which could result in increased pollution, undermine the legal foundation for the Mercury and Air Toxics Standards for Power Plants and establish a dangerous and deceptive precedent for cost benefit analysis if clean air safeguards.

EPA's proposal runs counter to the evidence regarding costs and benefits, and to common sense.

The American Lung Association's mission is to save lives by improving lung health and preventing lung disease. We strongly support policies that reduce pollution in the air we breathe because air pollution shortens life and imposes a heavy burden on the health of the American people, especially those living with lung disease – but also healthy adults. The American Lung Association strongly opposes this proposal.

I am also here as a mother. Doctors and scientists have repeatedly testified before this agency that mercury pollution in any form is highly toxic, and can cause persistent and lifelong IQ and motor deficits in children, starting before they are even born when a mother consumes unhealthy levels of contaminated fish.

As outlined in detail by my colleague a few minutes ago, there are other hazardous air pollutants emitted by coal-fired power plants linked to respiratory problems, cancer, and early death.

In 2011, I celebrated the final MATS rule and took comfort in its decades-long overdue protections.

And now, it is deeply concerning to me as a mother and as an advocate that EPA has proposed to reverse its finding that it is "appropriate and necessary" to place strong limits on mercury and other toxic emissions from power plants.

Technology put in place to comply with MATS across America today is working.

Mercury emissions from U.S. power plants have declined by 85% from 2006 to 2016, since 11 states began setting limits and MATS was adopted.

EPA's estimated health benefits include avoiding up to 11,000 premature deaths, 4,700 heart attacks and 130,000 asthma attacks each year – that's up to \$90 billion each year in avoided health costs. For every dollar spent, EPA estimated that Americans get \$3-9 in benefits.

Taken together, the health benefits of the MATS are a true public health success story. But EPA's proposal before us would only tell part of the story – and hide the true impact of this rule from the American people.

Most of the monetized benefits of the MATS rule included in EPA's 2011 estimate resulted from reduced PM 2.5. To be clear, these are direct benefits of compliance with the rule. Actions taken as a result of MATS, such as installing pollution control equipment, also reduce PM 2.5, leading to fewer asthma attacks, heart attacks and early deaths.

Rather than celebrate the lifesaving success of the MATS rule, however, EPA's proposal would exclude the benefits from reduced PM2.5 from its analysis, obscuring the total benefits of MATS and deceiving the American people regarding what is at stake for their health.

A complete analysis must include ALL the benefits.

Furthermore, EPA's analysis also ignores advances in the literature showing additional quantifiable impacts of mercury pollution that have emerged in the literature since 2011. The societal costs of neurocognitive deficits associated with methylmercury exposure in the U.S., for example, were estimated in 2017 to be approximately \$4.8 billion per year. EPA also fails to incorporate new evidence from a Harvard analysis showing that the annual benefits from cleaning up mercury could also be in the *billions*.

And finally, the EPA's analysis disregards the documented costs of compliance, which are much lower than EPA's 2011 estimates.

Separately, it is tremendously concerning that EPA's proposal creates a new category for waste coal plants and exempts them from compliance with MATS. This loophole will allow some of the dirtiest power plants to increase toxic pollution in the air we breathe.

We urge you not to allow this proposal to go forward. If adopted, this proposal will make it much more difficult to continue the lifesaving progress our country has made under the Clean Air Act.

Thank you.