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**Statement of Charles D. Connor
President & CEO American Lung Association**

**EPA's Proposal for the Control of Emissions
from New Marine Compression Ignition Engines
At or Above 30 Liters per Cylinder**

August 4, 2009

Good Morning, I am Charles D. Connor, President and CEO of the American Lung Association. I am pleased to be here today to support the U.S. Environmental Protection Agency proposal to help protect the public from the air pollution produced by Category 3 marine diesel engines.

Four months ago, just across the Hudson River, I stood with Administrator Lisa Jackson when she announced that EPA was putting forward the United States proposal to the International Maritime Organization (IMO) to reduce the pollution from ocean-going vessels. We are pleased that EPA is moving ahead to assert its authority under the Clean Air Act to address this problem.

Our message today is simple – we urge EPA to take every action to reduce the pollution from these vessels. We have applauded EPA for moving this process ahead through the IMO. However, EPA must also promulgate these regulations to ensure that the public health is protected regardless of the global action.

I had the privilege of serving 26 years in the United States Navy. In my career as a U.S. Navy Captain, I saw firsthand the staggering amounts of pollution that cruise ships, container ships, tankers and other ocean-going vessels released into the atmosphere. These ships dock at over 100 ports along our coastline and along navigable waterways far inland. By comparison, the U.S. Navy has made great strides to comply with the United States' emission standards during normal operations.

In my role as President and CEO of the American Lung Association, I am keenly aware of the impact that air pollution from these ships has on the health of millions of people across the nation. The pollution from these vessels jeopardizes the health and the lives of those who live and work along the nation's coastlines, including the Great Lakes. But it does not stop there. The smog- and soot-forming exhaust from these great ships travels hundreds of miles inland, threatening millions more who have no idea they breathe pollution that began in the boiler rooms in the harbors in far off New York City, Houston, Los Angeles and Chicago.

Air pollution threatens members of all of our families: our children and teenagers, our elders, and people who have chronic lung disease, heart disease, and diabetes. Air pollution sends people with lung disease to the hospital, shapes how children's lungs develop, causes heart attacks and can even kill.

EPA's analysis estimates that this effort will prevent between 13,000 and 33,000 premature deaths each year by 2030. Imagine 13,000 lives saved each year. That will be a tremendous achievement, yet it is not EPA's first. Because EPA required the clean-up of heavy equipment and other non-road vehicles 12,000 lives will be saved annually. EPA rules to clean-up trucks and buses will ultimately save more than 8,000 lives saved each year.

The American Lung Association fought for the adoption of each of those measures because of the impact they have. Our mission is to save lives. Cleaning up air pollution saves lives.

In the formal notice announcing this proposal, EPA invited comments on a number of issues. Time limitations do not permit me to comment in detail on all the issue, but we will do so in written comments. I will summarize a few comments here.

The American Lung Association strongly supports the use of cleaner fuel in ocean-going vessels. Reducing the sulfur levels in the fuel will result in significant reductions of sulfur dioxide and particulate matter.

The American Lung Association supports the Tier 2 nitrogen oxide standards. We believe manufacturers can meet the timeline proposed in the rulemaking.

We strongly support achieving additional nitrogen oxide benefits from Category 3 engines. But the American Lung Association also supports the earliest adoption and implementation of the Tier 3 standard. We recognize that EPA is concerned about the demands placed on industry, but EPA must use this opportunity to reduce an additional 70,000 tons of nitrogen oxides.

We note that EPA has not proposed to set an emissions standard for particulate matter for ocean-going vessel engines. We join with state officials in requesting that EPA introduce particulate matter emissions standards for these Category 3 engines. We also request that EPA consider establishing a program to reduce emissions from in-use Category 3 engines.

Thank you for the opportunity to present these comments. The American Lung Association supports the prompt adoption of these rules.