

As Prepared for Delivery
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On
The U.S. Environmental Protection Agency
National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility
Steam Generating Units Review of the Residual Risk and Technology Review
Docket ID# EPA-HQ-OAR-2018-0794

May 9, 2023

Good morning, I am Paul Billings – (P A U L B I L L I N G S), National Senior Vice President of Public Policy at the American Lung Association. The American Lung Association strongly supports the cleanup of hazardous air pollutants from coal and oil-fired power plants. Earlier this year, EPA reaffirmed that cleaning up power plants is appropriate and necessary. Cutting dangerous toxic air pollution from power plants is also a pressing public health imperative. The American Lung Association strongly supports EPA finalizing more stringent standards for power plants. We urge EPA to set more protective standards than the proposed levels.

We appreciate that cleaning up power plants is a priority for the administration. The President, on day one of his administration, signed Executive Order 13990 which called for the review of the mercury and air toxics residual risk and technology review by August 2021. We welcome the April 2023 proposal and urge EPA to finalize the rule no later than the end of 2023. The public cannot afford to wait any longer for stronger protections.

Mercury is a potent neurotoxin that causes permanent damage to the brains of babies and unborn children, leading to developmental delays, learning disabilities and birth defects. Power plants emit more than 80 hazardous air pollutants including arsenic, chromium, lead, formaldehyde, acid gases, dioxins, and furans. These pollutants can cause cancer; damage the eyes, skin, and breathing passages; harm the kidneys, lungs, and nervous system; cause cardiovascular disease; and kill. Power plants are a major source of metallic hazardous air pollutant emissions including arsenic, chromium and nickel. Arsenic, chromium, and nickel have been classified as human carcinogens.

Cleaning up this toxic pollution soup from power plants will help protect communities that already bear a disproportionate health burden from pollution. We know that there are adverse health effects caused by exposure to toxic air pollution from power plants that EPA has not quantified. But the benefits of the reductions of toxic pollution for those who eat and breathe adjacent to power plants are significant.

I will briefly reiterate our support for several key provisions.

We ask EPA to finalize a more stringent alternative standard of no higher than 0.006 pounds per million British thermal units of heat input (lb/MMBtu) for non-mercury metal hazardous air pollutants (filterable particulate matter). Setting a much more protective standards for filterable

PM will prevent more premature deaths. EPA's analysis shows that the 0.006 standards will prevent 22 times as many premature deaths in 2028 as EPA's proposed limit.

We support EPA's proposal to revise the mercury standard for Lignite-fired electric generating units to a more stringent level set for other power plants.

We strongly support EPA's proposal to require continuous emissions monitoring for particulate matter pollutants from all coal power generating units. Continuous monitoring will improve compliance and lead to greater protection for vulnerable communities.

In conclusion, toxic pollution from power plants threatens the health of people who live nearby, downstream and downwind from the facility. Setting more stringent standards will cut the pollution that threatens the health of vulnerable communities especially individuals who are pregnant and their children.

We urge you to finalize stringent new limits on mercury and air toxics without delay and no later than the end of this year. Thank you.