

Comments of Bryan Burton – As Prepared for Delivery  
American Lung Association  
On The U.S. Environmental Protection Agency’s Reconsideration of the National Ambient Air  
Quality Standards for Particulate Matter Docket ID No. EPA-HQ-OAR-2015-0072

February 22, 2023

My name is Bryan Burton and I am the Advocacy Manager for Healthy Air at the American Lung Association. I’m motivated to give public comment today because particle pollution has a significant negative effect on public health in my home state of Pennsylvania.

In my state, exposure to PM regularly causes worsened asthma and chronic obstructive pulmonary disease (COPD). High levels, both day to day and during short term spikes, can harm health. PM can cause heart attacks, strokes, heart disease, congestive heart failure; cause lung cancer. It has important impacts on fetal health including increase risk of low birth weight or infant mortality and impaired lung function in children. While our population is aging, this harmful pollution is leading to thousands of premature deaths in the Commonwealth. The Keystone State has rates of childhood asthma above the national average and worsening pediatric trends in many urban environmental justic communities.

Pennsylvania is critically affected by the PM standards set by the EPA for several reasons. The residents here use wood burning stoves as a primary source of heat at a greater rate than the national average. The use of wood burning stoves is clearly shown to increase both short term and annual PM readings in even rural areas. Breathing wood smoke routinely is directly tied to increased trips to the emergency room as well as missed days of work and school. An annual standard of 8 micrograms per cubic meter could help drive locations in Pennsylvania to adopt policies aimed at reducing wood burning and even help drive transitions to the use of electric heat pumps.

Pennsylvania is also unique nationally due to the extent of its industrialization, its energy production and its role as a transportation corridor. As a ratio of population to gigawatts produces, Pennsylvania exports more electricity to its neighbors than any other state. That means Pennsylvania residents are living with the PM 2.5 emissions from power plants located in their state for electricity being used by people in neighboring states. This important factor must be considered for the protection of fence line populations when deciding whether or not to follow the lower range of the CASAC recommendation of 8 micrograms per cubic meter on an annual basis.

The presence of these power plants, industrial complexes and extensive rail networks significantly increases the potential for accidental large-scale chemical and fossil fuel fires. Some of these accidents which could qualify as “exceptional events” may be excluded from attainment determinations for the annual and 24 PM2.5 standards but they nevertheless have a significant negative health impact on Pennsylvania. Failing to strengthen the standard to 8 mg/m<sup>3</sup> gives the public a false impression that heavy industry in Pennsylvania is being regulated at a level which protects the public health. When the U.S. Steel’s Coke Works outside of Pittsburgh, the largest of its kind in North America, experienced a massive fire on Christmas Eve, 2018, many of the spike readings were excluded from EPA reporting. These loopholes make it critical that local populations are protected annually by the lowest standard proven through meta-analysis of medical studies to protect human health.

Furthermore, failing to strengthen the standards to the most protective levels will mean that the the Air Quality Index is not as protective as it should be either. People who have compromised lung function or who are otherwise compromised such as people with diabetes, cancer or other chronic illnesses rely on the AQI to inform their lifestyle choices and level of outdoor activity. A stronger PM standard will provide these people, including children with asthma, with more accurate and relevant information that they can use to take steps to protect their own health on high pollution days.

Just outside the Port of Philadelphia are dense urban neighborhoods with urban justice populations that have less access to care and green space than the average American. Yet these communities regularly

have PM readings equal to the nation's most polluted areas. Please follow CASAC's advice and set PM2.5 NAAQS at the most protective end of their range recommendations and protect the quality of life for the vulnerable Philadelphians and all Pennsylvanians.