



Testimony of
Simon Bunyan, Campaign Project Manager, Environmental Defense Fund
on
March 18, 2019

Concerning:
Proposed Revised Supplemental Finding for the Mercury and Air Toxics Standards and
Results of the Residual Risk and Technology Review.

Docket Identification No. [EPA-HQ-EPA-HQ-OAR-2018-0794]

At:
EPA Headquarters
William Jefferson Clinton East Building, Main Floor
1201 Constitution Avenue, NW, Washington, DC 20460

Hello, my name is Simon Bunyan. I work in Washington, DC, as a Campaign Project Manager at the Environmental Defense Fund, which is an environmental organization with more than 2 million members across the nation. Thank you for the opportunity to testify today on this important issue.

I am here today to express my deep concerns over Administrator Wheeler's proposed revision to the existing Mercury and Air Toxic Standards. The current standards are responsible for lifesaving reductions in dangerous mercury, lead, arsenic, soot, and other toxic air pollutants released from coal- and oil-burning power plants. The revised rule will only serve to increase the toxic pollution that threatens our air, land, water, food, and wildlife.

Mercury, in particular, is a dangerous neurotoxin linked with damage to the brain, to the nervous system, and to fetal development. Studies conducted by the EPA before the mercury pollution protections were enacted found that one in six babies born in the U.S. had unsafe levels of mercury.

When the EPA finalized the MATS standards in 2011, the agency itself projected that the standards would annually avoid up to 11,000 premature deaths; nearly 5,000 heart attacks; 130,000 asthma attacks; and 5,700 hospital and emergency room visits.

And today, the standards are working. Prior to implementation, mercury pollution from coal-fired power plants was completely unlimited by federal authorities and accounted for 48 percent of all human-caused mercury pollution. However, between 2011 and 2017, this pollution declined by more than 81 percent nationwide according to the EPA's own Toxics Release Inventory Program. These are the very standards at risk of being rolled back under this proposal.

A critical point to iterate is that rolling back the MATS standards is an environmental justice issue: an attack on federal mercury pollution safeguards will have severe health impacts for

communities of color, who are already more likely to be exposed to dangerous air pollution at higher rates.

Nearly 40 percent of Latinos live within 30 miles of a coal-fired power plant, and nearly 70 percent of African Americans live within 30 miles of a coal-fired power plant. These families will be disproportionately harmed should the mercury standards be gutted. Even EPA's own scientists recognize that the health burden of pollution on African American communities is 54 percent higher than the health burden on the American population overall. And compared to white children, Latino children are twice as likely to die from asthma attacks, while African American kids are 10 times more likely.

It should be noted that the power industry and several major unions, including the National Rural Electric Cooperative Association, American Public Power Association, Edison Electric Institute, The International Brotherhood of Electrical Workers and The International Brotherhood of Boilermakers, all urged EPA not to pursue this deeply damaging attack on these health safeguards.

The reality is that this rollback will only harm Americans' health and pocketbooks. EDF respectfully urges you to withdraw this proposal and instead pursue policies that continue to reduce toxic air pollution to better protect our communities.

Thank you again for this opportunity to testify.