



**March 18, 2019**

**Testimony: National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units. Reconsideration of Supplemental Finding and Residual Risk and Technology Review**

My name is Mandy Warner, and I am a Senior Manager for Environmental Defense Fund. Environmental Defense Fund is an environmental organization with more than two million members nationwide. Thank you for the opportunity to testify today.

EDF respectfully urges the Environmental Protection Agency to withdraw this proposal. This is an unnecessary and uncalled for potential rollback of another public health protection by this Administration.

My oldest daughter will turn seven years old this year, the same age I was when Congress started the process to accelerate mercury and toxic air pollution protections via the 1990 Clean Air Act Amendments. It has literally taken generations to get these standards implemented, and yet today we are facing an action by EPA that could upend the progress we have made.

Let's be clear, the EPA is taking comment on whether the agency should rescind the Mercury and Air Toxics Standards – standards which annually reduce toxic air pollutants including mercury, lead, arsenic, and acid gases, and which are vital to keeping these poisons out of the air we breathe and the food we eat.

It is disingenuous to claim that EPA's action does not threaten the continued implementation of these standards and that there won't be some communities that could see increased toxics in their air directly as a result of the process EPA has willfully and needlessly started. Toxic air pollutants emitted by power plants can damage the brains and nervous systems of developing fetuses, harm reproductive systems, and can cause cardiovascular harms, respiratory impacts, and cancer.

When the standards were finalized in 2011, EPA assessed the full array of benefits and costs associated with implementing its rule, including the impact of reducing deadly soot, finding up to 11,000 lives were saved every year, along with the avoidance of 130,000 asthma attacks and other health harms. The analysis demonstrated that the benefits significantly outweigh the costs of implementing the standards. We know now from studies that have further monetized the value of reducing mercury that the benefits are orders of magnitude higher than EPA estimated, and that EPA and industry overestimated the cost of compliance.

Leaders from health and medical organizations, Tribal organizations, members of the faith community, members from both parties in Congress, environmental organizations, states, the power sector, and labor groups have opposed reopening MATS. 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 the opportunity to testify.