

There They Go Again: AEP Seeks Delay in Health Protections for Children and Elderly

AEP – one of the country’s largest emitters of dangerous air pollution – is seeking to delay new clean air protections that will save thousands of lives each year. There they go again. Over the past 40 years, AEP has tried to delay, weaken, or overturn regulations that would clean up highly polluting power plants and reduce pollution that is particularly dangerous for children and the elderly. As the quotes below show, AEP has used many of the same tactics time and again: (1) arguing that smokestack pollution does not affect human health; (2) making exaggerated claims about electricity price hikes and job losses; and (3) asserting that there is no feasible way to meet regulatory deadlines despite decades of industry experience meeting – and exceeding – pollution control requirements. There they go again.

Tactic #1: Question health risks of air pollution

- 1997** **“I won’t dispute that there is mercury in coal, but I don’t believe it’s that much.”**
- Paul Loeffelman, AEP Spokesmanⁱ
- 2004** **“There is a lack of any demonstrated link between power plant emissions and inhalation based health effects risks.”**
- John MacManus, AEP Vice President of Environmental Servicesⁱⁱ
- 2011** **“...power plant particulate emissions are not a significant risk to public health.”**
- AEP Sustainability Reportⁱⁱⁱ

Tactic #2: Threaten rise in energy prices and demise of U.S. businesses

- 1974** **“Literally thousands unemployed. Millions lost in state tax revenues and more millions lost by businesses that supply the coal industry.”**
- AEP Advertisement opposing EPA emission standards for sulfur dioxide^{iv}
- 1982** **“[AEP] has enclosed propaganda in its billings. The mailing warns that proposed controls to avoid ‘acid rain’ could cost the company – and thus its customers – \$2 billion a year. The figure is based on a company study that has been dismissed by the Congressional Research Service as based on ‘questionable assumptions.’”**
- Sarasota Herald-Tribune^v
- 1990** **“An American Electric Power official told the Globe the [Acid Rain] legislation could lead to ‘the potential destruction of the Midwest economy.’”**
- Boston Globe^{vi}

- 2011 “We will have to prematurely shut down nearly 25 percent of our current coal-fueled generating capacity, cut hundreds of good power-plant jobs, and invest billions of dollars in capital...The sudden increase in electricity rates and impacts on state economies will be significant.”
- Michael Morris, AEP Chairman & CEO^{vii}

Tactic #3: Claim that deadlines can't be met

- 1974 “There is no way on God’s green earth that the present sulfur-dioxide emissions standards can be met.”
- AEP Advertisement^{viii}
- 2010 “There is simply not enough time to permit, construct, and install [pollution control equipment] or build replacement capacity by these deadlines.”
- John MacManus, AEP Vice President of Environmental Services^{ix}

THE FACTS

AEP’s pattern of delays and fear mongering is simply not supported by the record. Here are the facts about efforts to reduce harmful air pollution from power plants:

- *A substantial body of empirical health studies, conducted by both federal agencies and independent researchers, documents the dangers of air pollution to human health. These studies have been subject to the scrutiny of the peer review process. Their conclusion: air pollution is both damaging and deadly to human health. A letter^x sent to Congressman Joe Barton by the leaders of our preeminent public health organizations – including the American Lung Association and the American Academy of Pediatrics – cited 30 such studies and noted that:*
 - *“The health impacts of short-term exposure (over hours to days) of particulate matter were found to include: death from respiratory and cardiovascular causes, including strokes; increased risk of cardiovascular harm, including acute myocardial infarction (heart attacks) and congestive heart failure, especially among the elderly and in people with cardiovascular disease; inflammation of lung tissue in young, healthy adults; increased hospitalization for cardiovascular disease, including strokes; hospitalization for asthma among children; and aggravated asthma attacks in children. Exposure to year-round particle pollution has also been found to cause premature death and cardiovascular harm, especially greater risk of death from cardiovascular disease. . . Evidence links long-term exposures to adverse reproductive and developmental outcomes such as low birth weight and infant mortality.”*
 - *“Mercury is one example of a persistent pollutant emitted into ambient air that leads to exposure through another route: organisms metabolized mercury into methylmercury, a developmental neurotoxicant that poses a significant hazard for children. The developing fetus and young children are thought to be disproportionately affected by methylmercury exposure, because many aspects of development, particularly brain maturation, can be disturbed by the presence of methylmercury. Minimizing mercury exposure is, therefore, essential to optimal child health. Industrial emissions, especially from coal-fired power plants, are the leading source of environmental mercury.”*

- *The Clean Air Act has been a tremendous success in protecting human health and achieved these results without harming the U.S. economy – between 1990 and 2020 the benefits of the Clean Air Act exceeded the costs of pollution reduction by 30:1.^{xi} Since the original Act was passed in 1970, dangerous air pollutants have been reduced by 50% or more while the economy has prospered. Lead emissions have been cut by 99%; particulate matter emissions by 83%, sulfur dioxide emissions by 58%. During this same period, our population has grown by over 50% and our economy by over 200%. The costs of achieving the tremendous public health and environmental benefits of the Clean Air Act Amendments of 1990 have been a fraction of industry forecasts, and significantly below EPA's own projections. For example, in 1990, power companies predicted that reducing sulfur dioxide pollution would cost \$1000-\$1500 per ton and electricity prices would increase up to 10% in many states. In fact, the actual pollution reduction cost has been between \$100 and \$200 per ton for most of the program, and electricity prices fell in most states. Acid rain has been dramatically reduced and the limits on sulfur dioxide pollution were met faster and at a strikingly lower price than anyone expected in 1990.^{xii}*
- *Between 1990 and 2006, when electric utilities were claiming that electricity rates would increase substantially because of EPA regulations, they actually fell in most states. Electricity prices fell by 47% in Arkansas, 32% in Georgia, 64% in Illinois, 28% in Indiana, 35% in Michigan, 30% in North Carolina, 18% in Ohio, 36% in Pennsylvania, 40% in Utah and 36% in Virginia.^{xiii}*
- *Regulated sources have had years of advance notice to prepare for new clean air standards and many power companies are well positioned for compliance. Further, sources have a range of compliance options available including pollution control retrofits, shifting capacity from higher emitting resources to under-utilized lower emitting resources, fuel switching, wholesale and retail energy purchases, demand side management, and transitioning from aging and high emitting infrastructure to cleaner power. For sources that have made a good faith effort to meet emission standards but are still facing challenges, EPA is authorized under the Clean Air Act to provide compliance extensions in accordance with specific statutory criteria.^{xiv}*

ⁱ Point Pleasant Register, Dec 12, 1997, “Group says power plants at heart of mercury poison in rivers.” Accessible at:

<http://news.google.com/newspapers?id=YELDAAAIBAJ&sjid=PqoMAAAAIBAJ&pg=5479.3981843&dq=american+electric+power+mercury&hl=en> (viewed 8/18/2011).

ⁱⁱ AEP Comments on EPA’s Proposed National Emissions Standards for Hazardous Air Pollutants, June 29, 2004, EPA Rulemaking Docket, Doc ID: EPA-HQ-OAR-2002-0056-3558.

ⁱⁱⁱ AEP 2011 Corporate Accountability Report, p. 22. Accessible at: http://www.aepsustainability.com/docs/2011_AEP_CARReport.pdf (viewed 8/18/2011).

^{iv} The Washington Post, Oct 25, 1974, AEP Display Ad 32, “Amen!”

^v Sarasota Herald-Tribune, Sept 4, 1982, “The dirty politics of clean air.” Accessible at: <http://news.google.com/newspapers?id=mJ4cAAAIBAJ&sjid=OGgEAAAIBAJ&pg=6718.183032&dq=american+electric+power+clean+air+act&hl=en> (viewed 8/18/2011).

^{vi} Boston Globe, Oct 17, 2010, “A clear water revival.” Accessible at http://articles.boston.com/2010-10-17/news/29321038_1_acid-rain-power-plant-global-warming (viewed 8/18/2011).

^{vii} AEP Press Release, June 9, 2011, “AEP shares plan for compliance with proposed EPA regulations.” Accessible at: <http://www.aep.com/environmental/news/?id=1697> (viewed 8/18/2011).

^{viii} The Washington Post, April 30, 1974, AEP Display Ad 13, “Are we blind to the real energy crisis?”

^{ix} AEP Comments on Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone; Proposed Rule, Oct 1, 2010, EPA Rulemaking Doc ID: EPA-HQ-OAR-2009-0491-2665.

^x American Lung Association, American Thoracic Society, American Public Health Association, Asthma and Allergy Foundation of America, American Academy of Pediatrics, Physicians for Social Responsibility. Letter to Representative Joe Barton, May 10, 2011. Accessible at: <http://www.lungusa.org/get-involved/advocate/advocacy-documents/doctors-letter-to.pdf> (viewed 8/18/2011).

^{xi} Environmental Protection Agency, April 2011, “The Benefits and Costs of the Clean Air Act from 1990 to 2020.” Accessible at <http://www.epa.gov/air/sect812/feb11/fullreport.pdf>.

^{xii} U.S. House of Representatives Committee on Energy & Commerce, June 16, 2009, “Industry claims about the costs of the Clean Air Act.” Accessible at: http://democrats.energycommerce.house.gov/Press_111/20090616/dc_industryjobs.pdf (viewed 8/18/2011).

^{xiii} See U.S. House of Representatives Committee on Energy & Commerce, June 16, 2009, “Industry claims about the costs of the Clean Air Act.” Accessible at: http://democrats.energycommerce.house.gov/Press_111/20090616/dc_industryjobs.pdf (viewed 8/18/2011) and U.S. Environmental Protection Agency, April 2011, “The benefits and costs of the Clean Air Act from 1990 to 2020.” Accessible at: <http://www.epa.gov/oar/sect812/prospective2.html> (viewed 8/18/2011).

^{xiv} Michael Bradley, Susan Tierney, Christopher Van Atten et al., August 2010, “Ensuring a clean, modern electric generating fleet while maintaining electric system reliability” and “Summer 2011 update.” Accessible at: <http://www.analysisgroup.com/article.aspx?id=10786> (viewed 8/18/2011).