Testimony
EPA's "Proposed Revisions to the National Ambient Air Quality Standards for Particle Pollution"
Docket Number EPA-HQ-OAR-2007-0492

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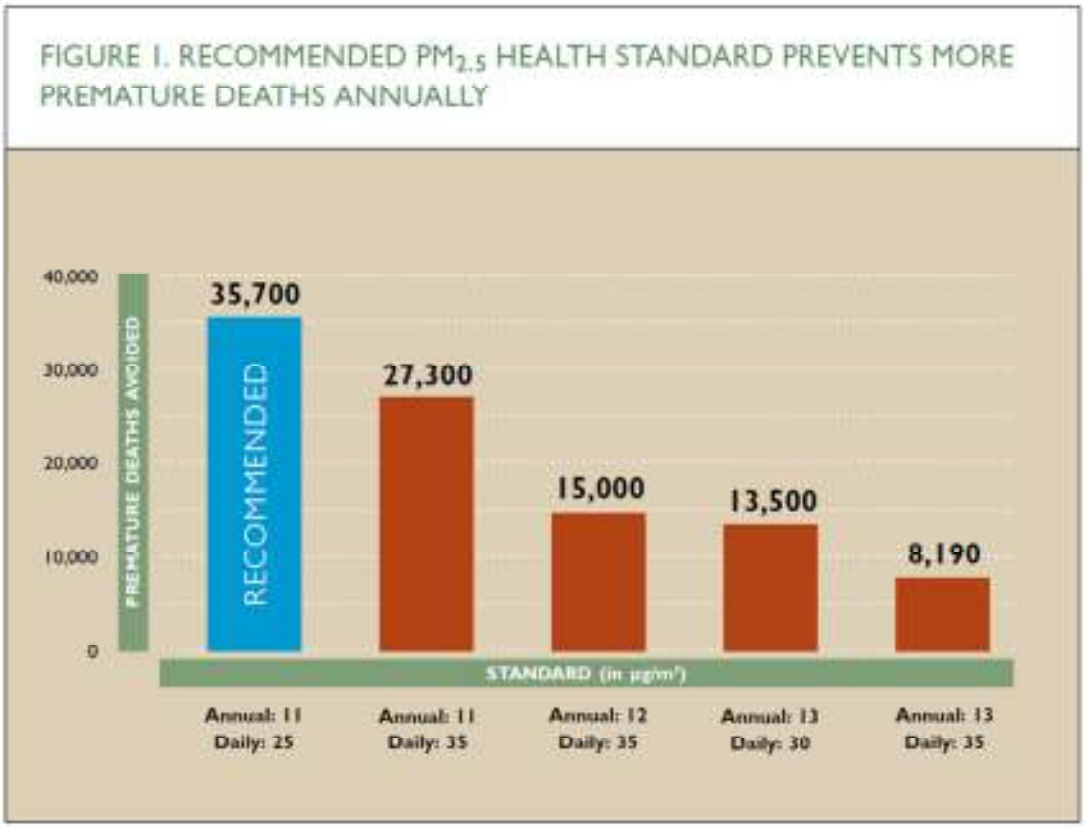
My name is Mandy Warner and I am a Climate and Air Policy Specialist with Environmental Defense Fund (EDF), a non-partisan environmental organization with more than 750,000 members nationwide. EDF is dedicated to working towards innovative, cost-effective solutions to environmental problems, building on a foundation of rigorous science, economics, and law.

Health and Environmental Benefits of a Strong Particulate Matter Standard

Particulate pollution, or soot, is associated with serious adverse human health impacts, including premature death; cardiovascular disease such as heart attacks, strokes, heart disease; and respiratory disease. Consistent with the most recent health science, we urge you to strengthen the annual standard for fine particulate matter to 11 micrograms per cubic meter and, although EPA is proposing to maintain the 24-hour standard at 35 micrograms per cubic meter, we recommend the 24-hour standard be strengthened to 25 micrograms per cubic meter due to the public health threat posed by short-term exposure. Particulate matter is also the main cause of reduced visibility and haze which harms the scenic vistas in our treasured National Parks, which about 280 million people visited in 2011.[i] We must protect these iconic natural areas for future generations.

When compared to current air quality, strengthening the nation's current health standards for particulate pollution could prevent as many as 35,700 premature deaths, 2,350 heart attacks, and 23,000 visits to the hospital and emergency room each year.[ii] EPA's analysis found that strengthening the annual standard to 11 micrograms per cubic meter and the daily standard to 30 micrograms per cubic meter would yield $14–36 billion in net monetized annual health benefits.[iii] A study released this month as a follow up to the Harvard Six Cities Study reaffirmed the association of particulate pollution exposure to increased risk of premature mortality. The study found that every increase of 10 micrograms per cubic meter in fine particulate pollution was associated with a 14% increased risk of "all-cause" mortality, a 26% increase in cardiovascular death, and a 37% increase in lung cancer death.[iv]



Source: American Lung Association, Clean Air Task Force, and Earthjustice, Sick of Soot: How the EPA Can Save Lives by Cleaning Up Fine Particulate Air Pollution, 2011.

Health Benefits for Pennsylvania

Emission reductions made here in Pennsylvania, along with reductions made in other states whose pollution travels into Pennsylvania, will help improve air quality, ensuring healthier, longer lives. Pennsylvania stands to benefit significantly from protective health-based standards for particulate pollution. Philadelphia is home to 32,000 children at risk from asthma and more than 363,000 people at risk from heart disease. [v] According to the American Lung Association, two Pennsylvania metropolitan areas ranked in the top 25 among cities most polluted by year-round particulate pollution.[vi] Additionally, the Philadelphia metro area is ranked fourth among areas in the country that will benefit the most from the daily and annual particulate standards EDF and other organizations are recommending, with an estimated 1,550 lives saved every year.[vii]

Updated Health Protections are Long Overdue

The public has been waiting long enough for updated standards based on the latest science. This proposal comes almost three years after the D.C. Circuit Court remanded the 2006 standards back to EPA to correct the deficiencies identified by the Court. Every year of delay has resulted in thousands of avoidable deaths, numerous heart attacks, asthma attacks, and other health impacts. The Clean Air Scientific Advisory Committee, EPA's independent science advisors,

unanimously concluded that the current standards do not protect human health. The American Thoracic Society, the American Academy of Pediatrics, the American Medical Association, the American Public Health Association and others have all called for more protective particulate matter standards. We look forward to EPA finalizing strong health-protective standards this December.

Health Protective Clean Air Standards are Achievable

Despite what some opponents may say, strong particulate standards can be met. Only 17 counties out of thousands across the nation are projected by EPA to not meet a strengthened standard of 11 $\mu g/m^3$ in 2020.[viii] As EPA notes, recently finalized rules including the Cross State Air Pollution Rule and the Mercury and Air Toxics Rule for power plants will help states achieve the updated standards. Power companies are planning now to meet state and federal clean air rules, to replace and modernize aging infrastructure, and to respond to market conditions that are driving investment in lower-emitting resources. Ensuring timely promulgation of these standards will further assist power companies in making prudent, long-term business decisions that protect the public health and welfare.

EDF will be submitting further technical comments on the proposal. Thank you for the opportunity to testify.

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[i] National Park Service, http://www2.nature.nps.gov/stats/viewReport.cfm.
[ii] American Lung Association, Clean Air Task Force, and Earthjustice, *Sick of Soot: How the EPA Can Save Lives by Cleaning Up Fine Particulate Air Pollution*, 2011. Available at: http://www.catf.us/resources/publications/view/159.
[iii] Environmental Protection Agency, *Regulatory Impact Analysis for the Proposed Revisions to the National Ambient Air Quality Standards for Particulate Matter*, June 2012.
[iv] Lepeule, J. et al. *Environmental Health Perspectives,* "Chronic Exposure to Fine Particles and Mortality: An Extended Follow-up of the Harvard Six Cities Study from 1974 to 2009," 120(7) July 2012.
[v] American Lung Association, *State of the Air 2012*, 2012. Available at: http://www.stateoftheair.org/2012/assets/state-of-the-air2012.pdf.
[vi] American Lung Association, *State of the Air 2012*, 2012. Available at: http://www.stateoftheair.org/2012/assets/state-of-the-air2012.pdf.
[vii] American Lung Association, Clean Air Task Force, and Earthjustice, *Sick of Soot: How the EPA Can Save Lives by Cleaning Up Fine Particulate Air Pollution*, 2011. Available at: http://www.catf.us/resources/publications/view/159.
[viii] Environmental Protection Agency, *Regulatory Impact Analysis for the Proposed Revisions to the National Ambient Air Quality Standards for Particulate Matter*, June 2012.