

Docket ID No. EPA–HQ– OAR–2018–0794

June 15, 2023

President Joseph R. Biden, Jr.
The White House
1600 Pennsylvania Ave, NW
Washington, DC 20500

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear President Biden and Administrator Regan:

Since the U.S. Environmental Protection Agency (EPA) first implemented the Mercury and Air Toxics Standards (MATS) significant progress has been made toward cleaning up dangerous air pollution. Our groups applaud the EPA's actions to reinstate the "appropriate and necessary" finding earlier this year. Yet, despite this progress, hazardous and persistent pollutants continue to harm people across the United States. We strongly support your work to update this vital safeguard and urge you to strengthen your proposal to even further cut deadly mercury and other toxic pollution that threatens our health, jeopardizes our air and water, and poses significant harm to vulnerable populations and children.

Air pollution from coal- and oil-fired power plants contains more than 80 hazardous air pollutants identified by the Clean Air Act for control including corrosive substances, carcinogens like formaldehyde and benzene, acid gases, organic carbon-based toxics, metals, and neurotoxins. These pollutants can cause cancer; damage the eyes, skin, and breathing passages; harm the kidneys, lungs, and nervous system; cause cardiovascular disease; and lead to premature death. They also harm people not only living near power plants, but also hundreds of miles away.

Unfortunately, the EPA's own 2021 data shows that toxic pollution like mercury is a persistent problem. That's why it's critical the EPA ratchet down this pollution without delay.

EPA's [proposal](#) would strengthen limits on particulate matter pollution from power plants (as a surrogate pollutant for toxic pollutants), require continuous emissions monitors for particulate matter, and tighten mercury limits for power plants that burn lignite coal. As proposed, by 2035 the new standard would cut pollution and protect people from:

- 82 pounds of mercury;
- 800 tons of fine particulate matter (PM_{2.5});

- 8,800 tons of sulfur dioxide (SO₂);
- 8,700 tons of nitrogen oxides (NO_x); and
- 5 million tons of carbon pollution (CO₂)

Cleaning up mercury and other air toxics is projected to lead to \$170 to \$220 million in annualized health benefits and a further \$170 million in annualized climate co-benefits. Many plants already meet these proposed standards, and the EPA should strengthen the standard for non-mercury metals to no more than 0.006 lb/MMBtu. The agency's own modeling shows that setting this standard at this level would increase overall benefits to over \$1 billion dollars annually, and still remain nearly three times greater than compliance costs. Additionally, we call on the EPA to apply these new standards to facilities that burn waste coal, one of the dirtiest forms of energy that exists.

We need Solutions for Pollution to deliver clean air, clean water, and a healthy climate for all. By finalizing the strongest possible Mercury and Air Toxics Standards, your administration can clean up toxic power plant pollution that harms vulnerable populations and those living closest to polluting power plants. We urge you to strengthen and finalize the proposed MATS no later than April 2024.

Thank you for your attention to this pressing matter.

Sincerely,

Action for the Climate Emergency

Alliance of Nurses for Healthy Environments

American Sustainable Business Network

Arizona Climate Action Coalition

Arizona Interfaith Power & Light

Arizona Wildlife Federation

Arizonans for Community Choice

Asociacion de residentes Inc

Atlantic Climate Justice Alliance

Black Millennials 4 Flint

Center for American Progress

Central California Asthma Collaborative

Change the Chamber

Clark County Black Caucus

Clean Energy Action

Climate Action Campaign

Climate Hawks Vote

Climate Reality Greater Maryland

Climate Reality MOCO

Climate Reality Project Central Indiana Chapter

Coalition for Clean Affordable Energy

Community for Sustainable Energy

Conservation Voters of PA

Dayenu: A Jewish Call to Climate Action

Defend Our Future

Earthjustice

Elders Climate Action

Elders Climate Action Heartland Chapter

Elders Climate Action, Arizona Chapter

Elders Climate Action, Colorado Chapter

Elders Climate Action, SoCal Chapter

Elders Climate Action, Virginia Chapter

Elected Officials to Protect America

Endangered Species Coalition

Environment America

Environmental Defense Fund

Environmental Law & Policy Center

Evangelical Environmental Network

Evergreen Action

Faith Alliance for Climate Solutions

Faith in Place

Faith Organizing Alliance

First Focus on Children

FreshWater Accountability Project

Georgia Interfaith Power and Light

Great Lakes Business Network

Green The Church

GreenLatinos

Groundwork Center for Resilient Communities

Healthy Climate Wisconsin

Hispanic Access Foundation

House of Worship

Illinois Association of School Nurses

Information Network for Responsible Mining

Institute For A Progressive Nevada

Interfaith Power & Light

Kids Climate Action Network

Las Vegas Indian Center

League of Conservation Voters

League of Women Voters

Medical Society Consortium on Climate and Health

MI Air MI Health

Michigan Climate Action Network

Michigan Clinicians for Climate Action

Michigan League of Conservation Voters

Michigan Sustainable Business Forum

Moms Clean Air Force

Moms Clean Air Force - Arizona

Moms Clean Air Force - Georgia

Moms Clean Air Force - Michigan

Montana Environmental Information Center

Mothers & Others For Clean Air

National Medical Association

National Wildlife Federation

Nevada Legislature, Asm. Howard Watts

Nevada Wildlife Federation

New Mexico Coalition for Clean Affordable Energy

New Mexico Interfaith Power and Light

North American Climate, Conservation and Environment (NACCE)

Northeast Ohio Black Health Coalition

Natural Resources Defense Council

Path to Progress

PennEnvironment

PennFuture

Pennsylvania Interfaith Power & Light

Physicians for Social Responsibility

Physicians for Social Responsibility Arizona

Poder Latinx

Respiratory Health Association

Rivulet Clinical Services

Rocky Mountain NAACP CO-MT-WY State Conference

Sierra Club

Sustainable Mill Valley

Sustainable Tucson

Texas Physicians for Social Responsibility

Tucson Audubon Society

U.S. PIRG

Union of Concerned Scientists

Union for Reform Judaism

US Partnership for Education for Sustainable Development

Western Clean Energy Campaign

Wisconsin Conservation Voters

Young Evangelicals for Climate Action