

Alison Field-Juma

From: no-reply@regulations.gov
Sent: Monday, March 25, 2019 3:13 PM
To: afieldjuma@oars3rivers.org
Subject: Your Comment Submitted on Regulations.gov (ID: EPA-HQ-OAR-2018-0794-0001)



Please do not reply to this message. This email is from a notification only address that cannot accept incoming email.

Your comment was submitted successfully!

Comment Tracking Number: 1k3-98z7-p56o

Your comment may be viewable on Regulations.gov once the agency has reviewed it. This process is dependent on agency public submission policies/procedures and processing times. Use your tracking number to find out the status of your comment.

Agency: Environmental Protection Agency (EPA)

Document Type: Rulemaking

Title: 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

Document ID: EPA-HQ-OAR-2018-0794-0001

Comment:

To: EPA Administrator Wheeler

From: OARS, Inc.

RE: 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

OARS is a non-profit watershed organization in central Massachusetts with over 1,000 members. Using science-based advocacy OARS works to restore the health of the rivers and streams in the 400-square mile watershed. The Sudbury-Assabet-Concord Rivers are federally-designated Wild & Scenic Rivers.

Our comments are in regard to the EPA's finding regarding "Whether regulation is "appropriate," after consideration of the costs and benefits of such regulation."

EPA proposes to "use a different consideration of cost for purposes of the appropriate and necessary finding, one that we believe aligns with the purpose of CAA section 112(n)(1)(A) as set forth in Michigan." To the contrary, we believe that EPA is in error in proposing to "directly compare the cost of compliance with MATS with the benefits specifically associated with reducing emissions of HAP as the primary inquiry in this finding, in order to satisfy its duty to consider cost in the context of CAA section 112(n)(1)(A).

We believe that the EPA has erred in not fully calculating the costs of atmospheric mercury deposition from coal-fired electric utility steam generating units (EGUs). The EPA's analysis of costs fails to include the cost of damage to freshwater systems, particularly recreational fishing and fish consumption, downwind of these

EGUs. In Massachusetts, the entire state has a Fish Consumption Advisory based on mercury pollution from atmospheric deposition. The main source of the mercury in this case is from coal-fired EGUs. No children or women of child-bearing age can eat any fish from our stream, ponds and rivers without risking serious damage. Populations who depend on fishing for their protein source in many cases continue to consume these fish with expected serious negative impacts on their health and neurological development, in particular. Have these health impacts been accounted for in the cost-benefit analysis?

The Nyanza Chemical Waste Dump Superfund site in Ashland is an additional source of mercury contamination of the Sudbury and Concord Rivers. EPA's calculations for the human impact of fish consumption takes into account the aforementioned atmospheric deposition and assumes a continued reduction based on current policy under MATS. The 2010 Record of Decision states quite plainly: "This remedy will allow most of OU4 to be used for fishing and fish consumption assuming "recreational" quantities of fish are consumed. This conclusion is, however, dependent on projections about the quantity of mercury deposited in the river by sources unrelated to the Nyanza facility." (ROD Sept. 2010; [URL REMOVED])

The Commonwealth of Massachusetts and its businesses have invested substantially in reducing local mercury emissions to the air by improving handling of mercury from dentists and reducing mercury emissions from incineration. Hutcheson et al. (2014) state: "Mercury emissions from major point sources in the hotspot area decreased 98%, and 93% in the rest of the state from the early 1990s to 2008. The significant declines in fish Hg concentrations in many lakes occurred over the second half of a two decade decrease in Hg emissions primarily from municipal solid waste combustors and, secondarily, from other combustion point sources. In addition to the substantial Hg emissions reductions achieved in Massachusetts, further regional, national and global emissions reductions are needed for fish Hg levels to decrease below fish consumption advisory levels." (M.S. Hutcheson, et al. 2014. "Temporal and Spatial Trends in Freshwater Fish Tissue Mercury Concentrations Associated with Mercury Emissions Reductions." Environmental Science & Technology 48 (4): 2193-2202.)

It is profoundly unjust and unreasonable to have this progress undone, and the health and recreational values of the Commonwealth impaired, due to emissions by EGUs in western states that pollute our waters.

In conclusion, we believe that the HAP benefits of MATS have been seriously underestimated by not taking into account the costs of atmospheric mercury deposition in Massachusetts and other downwind states through impacts on aquatic resources and hence human health. It is indeed appropriate and necessary to regulate coal- and oil-fired EGUs under section 112 of the CAA.

Uploaded File(s):

No files uploaded

This information will appear on Regulations.gov:

None of the information will appear on Regulations.gov

This information will not appear on Regulations.gov:

Organization Name: OARS, Inc.

Submitter's Representative: Alison Field-Juma

For further information about the Regulations.gov commenting process, please visit <https://www.regulations.gov/faqs>.

*** For security purposes, URLs were removed from this receipt but not from your comment on Regulations.gov.**