



Andrew Gottlieb *Executive Director*

February 4, 2019

BOARD OF DIRECTORS

Margo Fenn
President

Andrew Wheeler, Acting Administrator
Environmental Protection Agency
Attention: EPA Docket Center (EPA/DC), Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Charles Sumner
Vice President

RE: Proposed Revised Supplemental Cost Finding for the Mercury and Air Toxics Standards (EPA Docket ID No. EPA-HQ-OAR-2018-0794)

Bob Ciolek
Treasurer

Dear Acting Administrator Wheeler:

Maureen O'Shea
Clerk

The Association to Preserve Cape Cod (APCC) writes in strong opposition to the proposal by the Environmental Protection Agency to roll back the Mercury and Air Toxics Standards (MATS) policy by “determining it is not ‘appropriate and necessary’ to regulate hazardous air pollutant (HAP) emissions from power plants.” In adopting this proposed rollback of policy, the EPA would effectively abdicate its responsibility to protect the health and welfare of the American public by properly monitoring and regulating air pollution from coal-fired power plants.

Michael Corrigan

DeeDee Holt

Thomas Huettner

Pat Hughes

Founded in 1968, APCC is the leading nonprofit environmental advocacy and education organization for the Cape Cod, Massachusetts region. Representing thousands of members, APCC works for the adoption of laws, policies and programs that preserve, protect and enhance Cape Cod’s natural resources and quality of life.

Cheryl Lubin

Elysse Magnotto-Cleary

Blue Magruder

Reversing the EPA’s MATS policy would inevitably lead to a rollback of mercury pollution standards, which is a direct threat to Cape Cod’s environment and the health of the citizens of this region. Due to our geographic location, the northeastern U.S.—including Cape Cod—is highly vulnerable to mercury pollution and other toxic emissions from coal-fired power plants located in other parts of the country. These emissions adversely impact the quality of our air and water.

Eliza McClennen

Maureen O'Shea

Kris Ramsay

Robert Summersgill

Taryn Wilson

EPA’s own findings in 2000 confirmed that a link exists between the emissions of coal-generated power plants and mercury contamination in fish. Indeed, Cape Cod’s 1,000 freshwater ponds are suffering the consequences of power plant mercury emissions that make their way to our waterbodies and contaminate our fish and shellfish, which are then consumed by people. At too many of the Cape’s ponds, posted notices warning not to eat the fish caught in the ponds due to high levels of mercury contamination are a visible reminder of the impact this pollution has caused.

As the federal agency charged with protecting our nation’s public health and environment, it should

be incumbent upon the EPA to continue to monitor and limit emissions of mercury and the other toxic pollutants emitted by coal-fired plants such as arsenic, lead, hydrochloric acid, hydrogen fluoride, selenium, cadmium and chromium. Again, according to the EPA's own conclusions, these pollutants cause lung problems, harm to the central nervous system, kidney damage and other serious health disorders. Yet framed against these well-documented risks, the EPA's proposed MATS policy change cannot be viewed as anything other than an overt maneuver to favor the bottom line of the coal industry over the obvious public health benefits of air pollution restrictions.

Because of implementation of the MATS rule, power plant mercury emissions from 2011 through 2017 dropped by approximately 81 percent. The current policy is working, and the power generating industry is adapting to the standards set by the MATS rule. Rolling back MATS policies now would reverse the great progress we have achieved in the last ten years in decreasing mercury and other toxic pollutants in our air. APCC urges you to withdraw the MATS rollback proposal and instead renew the EPA's commitment to protect our nation's environment and the health of its citizens.

Sincerely,



Andrew Gottlieb
Executive Director



Don Keeran
Assistant Director