

Clearing the air about air quality standards

Written by Tom FitzGerald Special to The Courier-Journal

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At the Governor's Conference on the Environment this week, Secretary Len Peters, the Beshear administration's Energy and Environment Cabinet chief, is reported to have questioned the wisdom of the periodic review and adjustment of air quality standards, noting that further reductions in the ozone standard would be costly and of questionable benefit. I'm writing to clear the air about the Clean Air Act, and the costs of failing to adjust the air quality standards periodically to reflect the findings of peer-reviewed scientific literature in order to assure protection of public health from harmful levels of air pollutants.

The Clean Air Act is one of most important laws for protecting public health and the environment in the United States. For 42 years, it has protected the air we breathe while the American economy has grown. The substantial public health benefits of the Clean Air Act overwhelmingly outweigh the compliance costs associated with achieving them, according to numerous cost-benefit studies.

In addition, there are employment benefits to cleaning the air. Making, installing and maintaining pollution control equipment at industrial facilities supports and creates jobs. Compliance spending has spurred innovation and has led to the creation of a pollution control industry that employs American workers and has tens of billions of dollars in exports.

Today, as in the past, the Clean Air Act continues to cut pollution and protect the health of American families and workers, while creating opportunities for innovation and new technologies. There can be no serious dispute that the Clean Air Act saves lives, reduces illness and strengthens rather than weakens the workforce and economy. Consider these facts:

- According to a 1997 Environmental Protection Agency report to Congress, the first 20 years of Clean Air Act programs led to the prevention of 205,000 premature deaths, 843,000 asthma attacks and 18 million child respiratory illnesses in the year 1990.
- A March 2011 peer-reviewed EPA analysis shows that the Clean Air Act Amendments of 1990 prevented more than 160,000 premature deaths in 2010 and will prevent an estimated 230,000 deaths in 2020. Businesses and the economy will directly benefit from the prevention of 17 million work days lost in 2020.
- The Department of Commerce reports that United States is the world's largest producer and consumer of environmental protection technologies worldwide. In 2008, the global environmental protection technology market was approximately \$782 billion.
- Air pollution control equipment alone generated revenues of \$18 billion, including exports of more than \$3 billion. Environmental technology exports help the U.S. balance of trade, generating a \$20 billion surplus in 2007.
- In the United States, approximately 119,000 companies are engaged in the environmental technology business. In 2008, the U.S. environmental protection technology industry generated approximately \$300 billion in revenues, \$43.8 billion in exports and supported close to 1.7 million jobs.
- Economic data suggest that, despite the myth that they are at loggerheads, a healthy economy and population go hand in hand. Between 1970 and 2009 total emissions of the six principal air pollutants fell by 63 percent, and private sector jobs and GDP grew by 86 percent and 204 percent respectively.

- Environmental standards have a net positive economic and employment impact by spurring demand for pollution control investments and creating additional demand for employment in industries that provide intermediate goods to the environmental protection industry, and for manufacture and installation of equipment. The Institute of Clean Air Companies found that the Clean Air Interstate Rule alone resulted in 200,000 jobs over the past seven years due to the installation of control technologies at power plants.
- A 2005 Census Bureau survey of industry determined that all pollution abatement expenditures cost less than one-half of one percent of total revenue for manufacturing firms.

In 1970, and again in 1990, Congress affirmed and reaffirmed that air quality standards should be based on the protection of public health, and to account for scientific uncertainty, should include an “adequate margin of safety.” While the implementation of these standards by the states can consider economic costs in developing compliance strategies, the standards themselves are health-based. Congress mandated five-year reviews of the air quality standards in order to assure that the standards maintained concurrency with advances in scientific research in the public health field. The reason that many of the air quality standards have been tightened over the years is that the former standards were inadequate to meet the overarching goal of protecting public health, particularly those with developing or compromised immune, respiratory and cardiopulmonary systems. The standards go through a rigorous vetting process.

The statement that further tightening of the ozone standard would be of questionable benefit is quite simply wrong. Peer-reviewed research published in the journal of the National Institute of Environmental Health Sciences reports that the potential human health benefits of tightening the standard to the range recommended by the Clean Air Science Advisory Committee (between 70 and 60 parts per billion) would “result in dramatic public health benefits,” and that the annual number of avoided deaths during the years 2005-07 at 70 ppb would have been between 1,040 and 1,650; and between 3,800 and 5,510 at the 60 ppb range.

The suggestion by Secretary Peters that the process of periodic review of these public health air quality standards, which has since 1970 resulted in significant improvement in air quality, is somehow flawed or unwise, raises a legitimate question as to whether new leadership more committed to the goals and principles of the Clean Air Act and other environmental regulatory programs may be needed.

FitzGerald is the director of the Kentucky Resources Council. Much of the data in this op-ed is derived from the EPA, which is mandated by Congress under the Clean Air Act to conduct periodic reviews of the costs and benefits of the implementation of that act.