Environmental Protection Agency Public Hearing
40 CFR Parts 50, 53, and 58
Primary National Ambient Air Quality Standard for Sulfur Dioxide; Proposed Rule

Southern Alliance for Clean Energy Oral Comments
January 5, 2010
Atlanta, GA

Good Afternoon. My name is Mary Bendeck and I am Renewable Energy Coordinator for the Southern Alliance for Clean Energy, a regional non-profit organization that promotes responsible energy choices that ensure clean, safe and healthy communities throughout the Southeast. I am here today representing the interests and concerns of our members in the 8 Southeast states that we cover including but not limited to Georgia, Tennessee, North Carolina, South Carolina, and Florida.

We would like to thank the EPA for providing the opportunity today to comment on the proposed new sulfur dioxide rules that would tighten controls in order to protect public health.

In the United States, coal-fired power plants are the largest single source of SO2 emissions [1]. Coal naturally contains sulfur that combines with oxygen when burned to produce SO2. Sulfur dioxide can cause significant health problems to the upper respiratory system especially in areas near where coal plants or industrial facilities are located. In addition, sulfur dioxide also contributes to acid rain, which can cause damage to fish and other aquatic species, soil and vegetation.

We agree with EPA and the Clean Air Scientific Advisory Committee that the current rules, established in 1971, do not adequately protect public health. We support the 1-hour standard of 50 parts per billion (ppb), the most stringent standard proposed to-date. According to the American Lung Association, limiting SO2 emissions to 50 ppb would reduce SO2 emissions by a million tons per year and could save between 4,700 to 12,000 premature deaths each year, by 2020[2].

We also support the proposed installation of additional monitors in areas likely to have the highest short-term concentrations of SO2. However, we would like to see more than the proposed amount of 348 monitors installed given that the number of emissions sources with high short-term concentrations is in the thousands. For example, according to EPA, Category 3 ships traveling in and around the Savannah port were responsible for almost 2200 tons of SO2 in 2002. The contribution of SO2 from the mobile sources at the port will need to be monitored given that they are likely to place Savannah (Chatham County) in nonattainment for the new proposed standard, and attainment strategies will need to be implemented. Based on current EPA estimates, Fulton County would also fail to meet the 1-hour standard, and

---

[1] http://www.wri.org/publication/content/8607
[2] American Lung Association. Fact Sheet on SO2, November 2009.

additional monitors would be necessary in the area to identify sources of SO2 and appropriate implementation strategies.[3]

The proposed 1-hr rule in combination with the additional monitor testing would encourage the utility industry to install more protective SO2 pollution control equipment on existing coal burning facilities. Although a number of coal plants have installed more protective SO2 pollution control technologies, there are still many in the Southeast that have not, including smaller units at Crystal River Energy Complex in Florida, several Duke Energy facilities in North Carolina, and the John Sevier Fossil Plant in Tennessee to name a few. These units and others like them would be affected by the stronger rule, which would result in reduced emissions and better public health in the areas affected by the plants. The new rules would also encourage utilities to explore alternatives to future coal investments, drive retirement of older, less efficient coal facilities, and generally move investment away from high-polluting technologies, which would provide additional air and water quality benefits in synergistic, more efficient ways beyond what this rule would require.

In addition, we support the retention of the current daily and annual average standards to avoid disruption of ongoing clean air programs.

By implementing the new 1-hr standard, providing a more significant monitoring program, and retaining the current standards, EPA will yield significant health cost benefits that will save thousands of lives and provide clean air for future generations.

---

3 <http://www.epa.gov/air/sulfurdioxide/pdfs/SO2Concentrationscounty20062008.pdf>