



November 8, 2011

Connecticut

The Honorable Thomas R. Carper
United States Senate
Washington, DC 20510-0803

Delaware

District of Columbia

Dear Senator Carper:

Maine

I am writing in response to your request for information relating to the impact of the Cross-State Air Pollution Rule on the states in the Ozone Transport Region (OTR.)

Maryland

Massachusetts

Atmospheric modeling shows that transport of air pollutants into the OTC states continues to be a substantial problem. EPA's modeling showed that the Cross-State Rule is needed to reduce transport of air pollution and enable states to reduce ozone levels below 84 parts per billion. Reducing upwind sources of ozone is essential to help the OTC states meet the current ozone standard of 75 parts per billion.¹ For example, atmospheric measurements have shown that air entering the Mid-Atlantic region often exceeds the 75 ppb ozone standard, meaning that several states could eliminate all in state sources of pollution and still not meet air quality standards.

New Hampshire

New Jersey

New York

Pennsylvania

According to EPA's analysis, reducing upwind sources of ozone using a mechanism like the Cross-State Air Pollution Rule would have public health benefits exceeding the costs for all 28 of the states covered by the rule, including the OTC region states. EPA presented its estimates in the Regulatory Impact Analysis that is part of the rulemaking docket. Estimated costs for electricity generating industry are reported at \$1.4 billion in 2012 and \$0.8 billion in 2014 whereas the public health benefits are estimated at \$110 - \$280 billion in 2014. Public health benefits include avoiding approximately 13,000 – 34,000 premature deaths (1,500 to 14,000 within OTR), 15,000 nonfatal heart attacks, 8,700 hospital admissions, and 400,000 cases of aggravated asthma.

Rhode Island

Vermont

Virginia

William L. Driscoll
Executive Director

444 N. Capitol St. NW
Suite 638
Washington, DC 20001
(202) 508-3840
FAX (202) 508-3841
Email: ozone@otcair.org

¹ In our report "The Nature of the Ozone Air Quality Problem in the Ozone Transport Region: A Conceptual Description", revised August 2010, the OTC observed that "To maintain the current momentum for improving air quality so that the OTR states can meet current and future attainment deadlines, the direction is for deeper and broader regional NOx reductions coupled with appropriate local NOx controls and regional and local VOC controls."

The Honorable Thomas R. Carper
November 8, 2011
Page Two

Your letter also asked “what harm may come to the states in the Ozone Transport Region if the Cross-State Air Pollution Rule were to be removed from the books?” Without reductions in upwind sources of pollution, public health of the citizens in the Northeast and Mid-Atlantic states would be adversely affected. Without control of cross-state air pollution, the OTC region states cannot fully control air pollution in the region to a level that is protective of public health, so our citizens would suffer the negative consequences mentioned above, including premature deaths and heart attacks. The OTC states would also pay the price for such public health consequences, including: 1) lost productivity through increased work and school absences; 2) increased health care costs associated with public health impacts of higher pollution levels; and 3) higher costs to businesses in the OTR for controls on local emissions. At the same time, significantly more cost-effective control measures in upwind states would not be implemented, further exacerbating these inequities.

Finally, delays in reducing upwind sources of air pollution will likely translate to delay in reaching attainment within the OTC region, which means additional adverse health outcomes for the tens of millions of people who live in the mid-Atlantic and Northeastern states.

Thank you for your steadfast leadership to protect public health and our environment, particularly your tireless efforts to improve the quality of air that all Americans breathe. If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Collin P. O'Mara". The signature is fluid and cursive, written over a light gray rectangular background.

Collin P. O'Mara
Chair