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September 7, 1982

Dear Senator:

It is on the basis of our knowledge of the adverse health effects of air pollution that the American Lung Association has placed as a high priority the reauthorization of a strong Clean Air Act. We believe that the bill adopted by the Committee on Environment and Public Works will preserve the public health principles of the Clean Air Act and ensure timely attainment of the National Ambient Air Quality Standards in all regions of the country. The ALA endorses the Committee bill and urges your support of it when it is considered by the full Senate.

The preservation of the public health principles of the Clean Air Act and its programs to protect against the adverse health effects of air pollution can be demonstrated by reviewing the following provisions of the Committee bill.

I. The Health-Based Standards

The essential public health concepts embodied in the National Ambient Air Quality Standards are retained in the Committee bill including:

- o a definition of an adverse health effect which protects all population groups, including sensitive populations;
- o standards with an adequate margin of safety; and
- o standards developed based on the identification of and protection from adverse health effects, with costs of pollution abatement considered separately.

The standard-setting process is retained. In the 1977 amendments to the Act, Congress established a panel for scientific advice on air quality issues, the Clean Air Science Advisory Committee. This source of independent scientific review is important. The proper role of the panel is advisory and should remain so.

II. Hazardous Air Pollutants

The Committee bill retains and strengthens the Clean Air Act's program for controlling hazardous air pollutants. While fewer people are exposed to hazardous pollutants, the potential adverse effects are likely to be far more serious.

The bill retains the current law's definition of a hazardous air pollutant and the program's precautionary public health policy. The bill strengthens the program by:

- o directing EPA to complete review of at least 40 chemicals within the next five years and determine which are hazardous;
- o directing EPA, in choosing the chemicals, to give the highest priority to the 37 substances it has studied for so long--especially those shown to cause cancer in humans or animals;
- o designating these chemicals as hazardous by law if EPA fails to make decisions as directed and obliging the agency to set standards for them; and
- o requiring all sources emitting hazardous air pollutants to use technology at least as good as the best already in use.

III. The Nonattainment Program

The Committee bill maintains effective measures for meeting the health-based National Ambient Air Quality Standards in urban and industrial areas where air pollution still reaches unhealthy levels, while responding to the need of some areas for deadline extensions.

The bill:

- o provides for deadline extensions where needed:
 - extensions of no longer than 3 years to December, 1985 for areas unable to meet the NAAQS for sulfur dioxide, particulate matter, and oxides of nitrogen;
 - extensions to December 1992 for areas with the most severe auto related pollution, unable to meet the NAAQS for ozone and carbon monoxide; and
 - extensions would not be permitted unless all sources are using Reasonably Available Control Technology (RACT).
- o moderates requirements for new sources while maintaining the principle that new sources in nonattainment areas must be subject to more effective controls:
 - requires all new or modified stationary sources to use Best Available Control Technology (BACT); and
 - provides alternatives to the offset requirement.
- o moderates the scope of the Inspection/Maintenance Program for in-use automobiles by restricting the requirement to areas with the most severe carbon monoxide and ozone pollution; and
- o gives EPA discretion in imposing sanctions to determine the extent of funding cut-offs appropriate in given instances.

IV. Interstate Transport and Acid Precursor Reduction

The Committee bill adopts a program of action to reduce sulfur dioxide emissions. The primary purpose of this amendment is to reduce atmospheric loading of oxides of sulfur from stationary sources such as power plants, which have been identified as the main sources of pollutants that transform to acid rain and fine-particulate sulfates.

However, control of oxides of sulfur will also have positive health benefits. Fine particulates such as suspended sulfates, which are transformation products of oxides of sulfur, have been identified as causing adverse health effects, especially in sensitive individuals such as those with lung or heart disease.

Under the bill:

- o by 1995, annual sulfur dioxide emissions in the 31 states east of and bordering the Mississippi River must be reduced by 8 million tons below 1980 levels; and
- o by 1995, all sulfur dioxide reductions already required by the 1980 State Implementation Plans must be achieved.

The Committee bill allows for maximum flexibility and equity in achieving the emission reduction goal:

- o the Governors have the responsibility for allocating the emission reductions among the States and, within the States, among utility and industrial sources;
- o if the Governors fail to agree on an interstate allocation, the bill provides a formula which allocates emission reductions according to each State's relative contribution to the problem; and
- o provides for flexibility in accommodating the emissions of new sources.

V. The Mobile Source Control Program

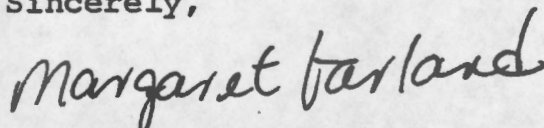
The Committee bill maintains the program to control emissions from mobile sources--the basic auto emissions standards and the provisions to ensure that in-use automobiles achieve those standards.

The Committee's decisions reflect careful consideration of the drastic impact relaxation of the mobile source control program would have on achieving the health-based standards, especially in those areas of the country with severe auto-related pollution. The bill would:

- o retain the 3.4 gram per mile (gpm) standard for carbon monoxide and the 1.0 gpm standard for oxides of nitrogen;
- o simplify the high altitude program by requiring only 3% of the new cars sold at high altitude to meet the same standards as at sea level;
- o enact into law the 0.2 gpm standard for particulate matter for 1986 and later model diesel cars;
- o codify into law, the standards for light-and heavy-duty trucks set by EPA; and
- o retain the existing assembly-line testing and pre-market certification programs.

The Clean Air Act has led to substantial improvement in the quality of air in our most polluted regions while preventing deterioration of air quality with America's continued growth. The Senate Committee bill provides a sound mechanism to ensure timely progress towards clean and healthful air for all Americans.

Sincerely,

A handwritten signature in cursive script that reads "Margaret Garland".

Margaret Garland
Chairman,
National Air Conservation Commission

MG/bej