



Trump's EPA Ignores the Costs of Air Pollution to Kill the Clean Power Plan

By Alison Cassidy

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On October 10, 2017, Scott Pruitt, administrator of the Trump administration's Environmental Protection Agency (EPA), officially proposed revoking the Clean Power Plan (CPP).¹ The CPP, finalized by President Barack Obama in August 2015, set the first-ever carbon pollution standards for power plants.² The EPA estimated that these pollution standards would provide enormous health and climate benefits that would outweigh estimated compliance costs by a ratio of as much as 6-to-1.³ To support his decision to revoke the standards, Administrator Pruitt has chosen a radical path: discounting the human health benefits of cutting soot- and smog-forming pollution from the electric power sector.

Policies to cut carbon pollution have the co-benefit of improving air quality

The Obama EPA estimated that the CPP would reduce carbon dioxide emissions by 32 percent from 2005 levels by 2030.⁴ At the same time, the CPP would produce certain co-benefits—other pollution reductions that result from implementing the plans developed to cut carbon pollution. The EPA concluded that the CPP also would reduce emissions of sulfur dioxide (SO₂), nitrogen oxides (NO_x), and fine particles, exposure to which can trigger asthma attacks and even cause premature death. By 2030, power plant SO₂ and NO_x emissions would be 90 percent and 72 percent below 2005 levels, respectively.⁵

Cutting harmful air pollutants provides a tremendous economic benefit

Using the best available science on the health impacts of exposure to air pollution, the EPA estimated that cutting SO₂, NO_x, and fine particles would avert 3,600 premature deaths, 1,700 heart attacks, 90,000 asthma attacks, and 300,000 missed workdays and school days every year. As part of its cost-benefit analysis, the Obama EPA assigned a monetary value to these benefits. The agency found that these health co-benefits could total as much as \$34 billion by 2030.⁶

The Trump EPA ignores proven science to hide the CPP's benefits

In his proposal to revoke the CPP, Administrator Pruitt proposes to ignore conclusive science on the health-related impacts of exposure to fine particle pollution in order to wipe billions of dollars in health benefits off the books. This sleight of hand helps Administrator Pruitt make the false case that the costs of complying with the CPP outweigh the benefits.

Reams of scientific studies show that fine particles can lodge deep in the lungs and trigger asthma attacks and premature death from respiratory and heart disease.⁷ Administrator Pruitt proposes two alternative ways to assess the health benefits of reducing particle pollution, both of which disregard sound science on fine particle exposure. For the first alternative, he assumes that the risk of premature death falls to zero below certain concentrations. For the second alternative, Administrator Pruitt assumes that the risk of death falls to zero below the National Ambient Air Quality Standard (NAAQS) for annual concentrations of fine particles (PM_{2.5}).⁸

These arbitrary thresholds have no scientific basis, as exposure to fine particles at concentrations below the annual NAAQS carries significant risk, particularly for children, the elderly, and those with respiratory and heart conditions. The World Health Organization concludes the following about exposure to fine particles: “There is no evidence of a safe level of exposure or a threshold below which no adverse health effects occur.”⁹

By dismissing science, Administrator Pruitt is attempting to obscure the full range of health benefits of the CPP. His analysis concludes that repealing the CPP would result in forgone health benefits totaling \$19 billion to \$22 billion in 2030—far below the Obama EPA’s \$34 billion high-end estimate.

The Trump EPA aligns with fossil fuel interests and conservative think tanks

Administrator Pruitt’s choice to dismiss co-benefits is radical but not surprising. As attorney general of Oklahoma, he joined Murray Energy Corp., Southern Co., Utility Air Regulatory Group, and others in litigation to challenge the EPA’s use of pollutant co-benefits to justify its limits on mercury emissions from power plants.¹⁰

Some conservative think tanks also have railed against the EPA’s standard practice of including health co-benefits when assessing the net benefits of a proposed policy. The Heritage Foundation, for example, has written that the agency should justify a rule “based on the direct benefits connected with the purpose of a regulation”—in this case,

cutting carbon pollution.¹¹ The American Enterprise Institute and the Competitive Enterprise Institute also have been vocal opponents of counting co-benefits in EPA rules.¹² Several former staff members of these organizations landed high-level positions in the Trump administration.¹³

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Endnotes

- 1 Environmental Protection Agency, *Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units; Proposed Rule* (U.S. Department of Energy, 2017), available at https://www.epa.gov/sites/production/files/2017-10/documents/frn_cpp_repeal_2060-at55_proposal_20171010disclaimer.pdf.
- 2 U.S. Environmental Protection Agency, "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units; Final Rule," *Federal Register* 80 (205) (2015).
- 3 U.S. Environmental Protection Agency, "Fact Sheet: Clean Power Plan By The Numbers" (2015), available at <https://archive.epa.gov/epa/cleanpowerplan/fact-sheet-clean-power-plan-numbers.html>.
- 4 U.S. Environmental Protection Agency, "Fact Sheet: Overview of the Clean Power Plan" (2015), available at <https://archive.epa.gov/epa/cleanpowerplan/fact-sheet-overview-clean-power-plan.html>.
- 5 U.S. Environmental Protection Agency, "Fact Sheet: Clean Power Plan By The Numbers."
- 6 U.S. Environmental Protection Agency, "Fact Sheet: Overview of the Clean Power Plan."
- 7 Environmental Protection Agency, *Quantitative Health Risk Assessment for Particulate Matter* (U.S. Department of Energy, 2010), available at https://www3.epa.gov/ttn/naaqs/standards/pm/data/PM_RA_FINAL_June_2010.pdf.
- 8 Environmental Protection Agency, *Regulatory Impact Analysis for the Review of the Clean Power Plan: Proposal* (U.S. Department of Energy, 2017), p. 8, available at https://www.epa.gov/sites/production/files/2017-10/documents/ria_proposed-cpp-repeal_2017-10.pdf.
- 9 World Health Organization, "Health Effects of Particulate Matter" (2013), p. 6, available at http://www.euro.who.int/__data/assets/pdf_file/0006/189051/Health-effects-of-particulate-matter-final-Eng.pdf.
- 10 Opening Brief of State and Industry Petitioners, *Murray Energy Corporation et al v. U.S. Environmental Protection Agency*, U.S. Court of Appeals for the D.C. Circuit, November 18, 2016.
- 11 The Heritage Foundation, "Blueprint for a New Administration: Priorities for the President" (2016), available at http://thf_media.s3.amazonaws.com/2016/BlueprintforaNewAdministration.pdf.
- 12 See, for example, Benjamin Zycher, "The magic of the EPA's benefit/cost analysis," *The Hill*, June 3, 2016, available at <http://www.aei.org/publication/the-magic-of-the-epas-benefitcost-analysis/>; Marlo Lewis Jr., "Comment on EPA Power Plan's Alleged Air Pollution 'Co-Benefits,'" Competitive Enterprise Institute OpenMarket blog, September 24, 2016, available at <https://cei.org/blog/comment-epa-power-plans-alleged-air-pollution-%E2%80%99Cco-benefits%E2%80%99D>.
- 13 See Center for American Progress Action Fund, "Trump's Dirty Deputies," available at <https://dirtydeputies.org/> (last accessed October 2017).