

Comments to EPA on its Supplemental Plan to address Interstate Transport of Air Pollution for the 2015 8-Hour Ozone National Ambient Air Quality Standards and Federal “Good Neighbor Plan” Requirements for the 2015 8-Hour Ozone National Ambient Air Quality Standards for 5 states

(Docket ID No. EPA–HQ–OAR–2023–0402)<sup>1</sup>

**From: Melissa Ramos, American Lung Association**

**March 4, 2024**

Good morning. My name is Melissa Ramos and I’m the Sr. Manager for Clean Air Advocacy at the American Lung Association in Arizona. Thank you for the opportunity to provide comments on the addition of five more states to the “Good Neighbor Plan.” The Lung Association supports this plan to address transported ozone pollution by cleaning up NOx from sources especially in Arizona that will protect residents who are subjected to harmful air pollution.

We strongly support the proposed NOx emissions limits for multiple industrial sources in Arizona. These sources are contributing to levels of ozone pollution downwind that are causing real harm to health. In addition, these limits will benefit Arizonans too. The American Lung Association’s annual State of The Air report from 2023<sup>2</sup> found Arizona experiences some of the worst air quality in the country. Maricopa county ranks as the 7<sup>th</sup> most polluted for ozone while Pinal county ranks 22<sup>nd</sup> for ozone and 12<sup>th</sup> for year-round PM pollution. Pinal county also has the dubious distinction of being among eleven counties receiving failing grades for all 3 measures of pollution – ozone, long-term and short-term PM<sub>2.5</sub>.

**The most recent polling by the American Lung Association revealed 83%<sup>3</sup> of Arizonans view air pollution as a serious problem.** Our air pollution crisis is clear, and the Good Neighbor Plan is an important part of the solution. EPA’s proposal will provide vital protections for interstate air pollution and drastically reduce pollution from power plants and industrial sources affecting Arizonans and thousands downwind.

Reducing nitrogen oxides (NOx) is necessary to safeguard public health and meet the National Ambient Air Quality Standards for ozone. NOx reacts to form ozone, which can worsen respiratory and heart conditions and elevate the risk of premature death. Prolonged exposure can permanently damage lung function among children and could have harmful impacts to the central nervous system, reproductive system, and overall development.

In addition to its role in ozone formation, NOx is a powerful air pollutant on its own with serious impacts on human health and environment. It is highly reactive, and can cause a range of health harms, including airway inflammation, cough and wheezing, and a greater likelihood of asthma attacks, emergency department visits and hospital admissions for people with lung disease. **This is especially harmful to nearly 130,000 children and approximately half a million adults living with asthma in Arizona<sup>4</sup>.**

**These volatile pollutants are harmful to everyone, but pose a significant threat to vulnerable populations. Adults with underlying health concerns, children who still have developing lungs, elderly people who are more likely to have compromised immune systems, low-income populations who lack**

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[https://www.epa.gov/system/files/documents/2024-01/11159\\_gn-plan-supplemental-proposed-preamble-and-rule\\_20231220\\_admin.pdf](https://www.epa.gov/system/files/documents/2024-01/11159_gn-plan-supplemental-proposed-preamble-and-rule_20231220_admin.pdf)

<sup>2</sup> <https://www.lung.org/research/sota/key-findings/most-polluted-places>

<sup>3</sup> <https://www.lung.org/getmedia/de906272-64b9-4f04-bb50-7d6b472ccfc1/ALA-AZ-Survey-Memo-F12-11-23.pdf>

<sup>4</sup> <https://www.lung.org/research/sota/city-rankings/states/arizona>

**American Lung Association**

**access to care, and people of color who oftentimes are in close proximity to polluting sources – these frontline communities are dealing with the brunt of our air pollution burdens.**

In conclusion, we strongly support this proposed FIP on transported ozone pollution with source-specific NOx reduction requirements in upwind states to protect the health of the public in downwind states as well as local populations living close to large emission sources. This action is essential in meeting EPA's obligation to fulfill the promise of the Clean Air Act: healthy air for all to breathe.