

THE TOXIC AIR BURDEN

From Industrial Power Plants

FEBRUARY 2012



Introduction

In 2011, under a court-ordered deadline, the Environmental Protection Agency issued revised Clean Air Act emission standards for industrial power plants—also known as industrial boilers. These standards (often referred to as the "boiler MACT") will save thousands of lives each year and prevent widespread sickness and suffering. Industry groups, including the Koch brothers, SPI: The Plastics Trade Association, and others, have launched an attack on Capitol Hill in an attempt to permanently block these protections. If they succeed, the pollution and subsequent health damage will continue unabated.

Industrial power plants provide heat and electricity to major industrial facilities like chemical plants and oil refineries. While some industrial power plants are clean and well-controlled, others have poor pollution controls for the large quantities of coal and other dirty fuels that they burn. Though smaller than regular power plants, industrial power plants are the nation's third largest source of mercury pollution. Their emissions of fine particles—which penetrate deep into people's lungs—kill as many as 8,100 people every year.¹

The EPA has stated that there are approximately 1,750 industrial power plants nationwide that will need to meet emission limits for hazardous air pollutants under the standards for major sources of air pollution.² Research by Earthjustice identified that there are 1,753 industrial power plants located at 758 individual facilities in 44 states, Puerto Rico and the U.S. Virgin Islands that will need to meet emission limits (see Appendix B: Research Methods for more info). A map of these facilities is available at <http://www.earthjustice.org/boilers>.³

The baseline emissions of these industrial power plants, according to data from the EPA, exceed:

- 10,000 pounds/year of mercury;
- 215,000 pounds/year of lead;
- 123,000 pounds/year of chromium;
- 100 million pounds/year of hydrochloric acid; and
- 100 million pounds/year of fine particulate matter.

¹ <http://www.epa.gov/airquality/combustion/docs/20111202overviewfs.pdf>

² EPA's Office of Air and Radiation. *Reconsideration Proposal for Boilers at Area Sources, Boilers/Process Heaters at Major Sources, and Commercial/Industrial Solid Waste Incinerators and Proposed Definition of "Non-Hazardous Solid Waste,"* p. 8. December 2, 2011. Available at:

<http://www.epa.gov/airquality/combustion/docs/20111202presentation.pdf>

³ See Appendix A for a breakdown of how many industrial power plants/facilities with industrial power plants are located in each state.

These numbers illustrate the tremendous capacity of industrial power plants to pollute our air. The owners of these industrial power plants, along with their congressional allies, have sought time and again to kill these standards. Two bills were introduced in 2011—S. 1392 in the U.S. Senate and H.R. 2250 in the House of Representatives—that would permanently exempt industrial power plants from the Clean Air Act. These bills have also been attached repeatedly as "riders" to unrelated, must-pass budget and payroll tax bills, a disingenuous strategy to undercut badly needed public health protections by trading them off against legislation designed to provide economic relief.

Key Findings

- 16 states (AL, FL, GA, IA, IL, IN, MI, MN, NC, NY, OH, PA, SC, TN, VA, WV) are in the top 20 for all of the following: baseline emissions of mercury, lead, chromium, hydrochloric acid and fine particulate matter from industrial power plants.
- **80 percent** of the facilities with the highest baseline emissions of **mercury** from industrial power plants are in the **two highest categories of potential risk to human health** from airborne toxics, according to data compiled by National Public Radio and the Center for Public Integrity.⁴
- **75 percent** of the facilities with the highest baseline emissions of **lead** from industrial power plants are in the **two highest categories of potential risk to human health** from airborne toxics.
- **70 percent** of the facilities with the highest baseline emissions of **chromium** from industrial power plants are in the **two highest categories of potential risk to human health** from airborne toxics.
- **65 percent** of the facilities with the highest baseline emissions of **hydrochloric acid** from industrial power plants are in the **two highest categories of potential risk to human health** from airborne toxics.
- **90 percent** of the facilities with the highest baseline emissions of **PM_{2.5}** from industrial power plants are in the **two highest categories of potential risk to human health** from airborne toxics.

Health Impacts of Selected Pollutants

Chromium, a known carcinogen, is a metal emitted in a variety of heavy industrial processes. Emissions have been linked to breathing problems and lung disease in some workers. Chromium-polluted drinking water was memorably chronicled in the Oscar-nominated film, *Erin Brockovich*.

⁴ This data comes from *Poisoned Places*, an investigative series conducted by National Public Radio and the Center for Public Integrity. NPR and CPI gave facilities a risk score between 1 and 5 and described the score thus: "A ranked grouping from 1 to 5, based on a multi-year average of risk screening scores from the EPA's Risk Screening Environmental Indicators tool. The tool addresses chronic human toxicity associated with long-term exposure to harmful chemicals." The higher a facility's score, the higher potential risks it poses to human health.

Lead can damage the nervous system and cause developmental delays and adversely impact memory and behavior. Lead is also linked to cardiovascular and kidney effects, anemia, and weakness of the extremities. To protect the public, lead has been removed from gasoline and household paints.

Hydrochloric acid is known to be corrosive to skin, eyes, and mucus membranes. Inhalation of the pollutant can cause eye, nose and respiratory tract irritation, ulceration, coughing, chest tightness and shortness of breath. Long-term exposure to hydrochloric acid can damage lung function.

Mercury is a potent neurotoxin that is linked to lower IQs in young children and other developmental damage. Women of child bearing age are particularly sensitive to the effects of mercury as the pollution can affect children in the womb. Industrial power plants emit mercury in the air where it can return to earth in rain or snow. Once introduced into the water stream, mercury can be absorbed into fish and later consumed by humans. For this reason, virtually every state has posted mercury advisories for fishing. Mercury is so potent that less than one teaspoon can contaminate an entire 20-acre lake to the point where fish are unsafe to eat. The EPA has estimated that "more than 300,000 newborns each year may have increased risk of learning disabilities associated with in utero exposure to methylmercury."⁵

PM_{2.5}, also known as fine particulate matter or soot, can penetrate deep into the respiratory tract, reaching the lungs. Exposure to soot can harm the cardiovascular and respiratory systems and lead to premature death.

Data Tables: States

MERCURY

Table 1: Toxic 20 States, Baseline Mercury Emissions From Industrial Power Plants

	STATE	EMISSIONS¹
1	IN	956
2	OH	797
3	IA	650
4	PA	526
5	WV	431
6	NC	426
7	TN	403
8	MI	393
9	AL	384
10	SC	381
11	GA	356
12	VA	340
13	FL	331
14	IL	311
15	MN	277

⁵ <http://www.epa.gov/hg/exposure.htm>

16	WY	275
17	WI	250
18	MD	232
19	VI	209
20	NY	188
TOTAL		8,116

¹ In pounds/year.

LEAD

Table 2: Toxic 20 States, Baseline Lead Emissions From Industrial Power Plants

	STATE	EMISSIONS ¹
1	OH	15,447
2	GA	14,818
3	NC	14,435
4	LA	13,855
5	IN	13,238
6	SC	12,046
7	AL	11,537
8	PA	7,902
9	IA	7,592
10	WA	5,929
11	TN	5,920
12	VA	5,792
13	FL	5,726
14	WV	5,459
15	MN	5,386
16	MI	5,338
17	IL	5,277
18	AR	5,231
19	NY	5,209
20	VI	5,163
TOTAL		171,300

¹ In pounds/year.

CHROMIUM

Table 3: Toxic 20 States, Baseline Chromium Emissions From Industrial Power Plants

	STATE	EMISSIONS ¹
1	OH	13,066
2	IN	8,503
3	IA	6,602
4	NC	6,465
5	WI	5,771
6	PA	5,643
7	TN	5,628
8	SC	5,380
9	WV	4,738
10	VA	4,629
11	IL	4,330
12	MN	3,436
13	VI	3,397
14	GA	3,278
15	AL	3,231
16	MI	3,040
17	NY	2,967
18	FL	2,837
19	MO	2,530
20	NJ	2,373
TOTAL		97,844

¹ In pounds/year.

HYDROCHLORIC ACID

Table 4: Toxic 20 States, Baseline Hydrochloric Acid Emissions From Industrial Power Plants

	STATE	EMISSIONS ¹
1	NC	9,864,805
2	MI	8,691,528
3	IA	8,298,390
4	WV	7,242,533
5	OH	6,735,939
6	IL	5,467,789
7	WI	5,139,151
8	MN	4,470,524
9	IN	4,324,221
10	VA	4,259,756
11	TN	4,155,098
12	WY	3,975,699
13	PA	3,824,897
14	SC	3,733,386
15	MO	3,592,435
16	AL	3,189,553
17	GA	2,844,611
18	NY	2,405,808
19	FL	1,366,993
20	CO	1,262,670
TOTAL		94,845,786

¹ In pounds/year.

PM_{2.5} (SOOT)**Table 5:** Toxic 20 States, Baseline PM_{2.5} Emissions From Industrial Power Plants

	STATE	EMISSIONS¹
1	GA	7,726,715
2	AL	7,579,788
3	FL	6,841,863
4	NC	6,793,695
5	LA	6,684,567
6	VA	6,194,684
7	AR	4,723,160
8	NY	4,139,864
9	MI	3,781,426
10	ME	3,691,484
11	IN	3,634,725
12	SC	3,559,027
13	PA	3,268,919
14	WA	3,098,824
15	IA	3,015,320
16	MS	2,887,225
17	OH	2,823,066
18	WI	2,756,235
19	OR	2,190,899
20	MN	2,170,235
TOTAL		87,561,721

¹ In pounds/year.

Data Tables: Facilities

Individual facilities listed in the tables that follow have an associated health risk score between 1 and 5. This data comes from *Poisoned Places*, an investigative series conducted by National Public Radio and the Center for Public Integrity. NPR and CPI describe the score thus: "A ranked grouping from 1 to 5, based on a multi-year average of risk screening scores from the EPA's Risk Screening Environmental Indicators tool. The tool addresses chronic human toxicity associated with long-term exposure to harmful chemicals." The higher a facility's score, the higher potential risks it poses to human health.

Table 6: Baseline **Mercury** Emissions From Industrial Power Plants

Toxic 20 Facilities

	FACILITY	CITY	ST	RISK	BASELINE EMISSIONS¹
1	John Deere Dubuque Works	Dubuque	IA	4	311
2	U.S. Steel - Gary Works	Gary	IN	5	298
3	HOVENSA LLC	Christiansted	VI	N/A	209
4	ArcelorMittal Burns Harbor LLC	Burns Harbor	IN	5	156
5	INVISTA S.A.R.L. Seaford Plant	Seaford	DE	5	150
6	THUNDER BASIN COAL_COAL CREEK MINE	WRIGHT	WY	N/A	136
7	Luke Mill	Luke	MD	5	136
8	ArcelorMittal Weirton Inc.	WEIRTON	WV	5	121
9	Cargill	Akron	OH	4	117
10	Eastman Chemical Company	Kingsport	TN	5	116
11	Alcoa Inc. - Warrick Operations	Newburgh	IN	5	109
12	DuPont Washington Works	Washington	WV	5	96
13	United States Sugar Corporation Clewiston Mill	Clewiston	FL	5	92
14	MeadWestvaco of Virginia, Inc.	Covington	VA	4	88
15	Kimberly-Clark Mobile Paper Mill	Mobile	AL	N/A	86
16	Dakota Gasification Co. - Great Plains Synfuels Plant	Beulah	ND	N/A	83
17	ArcelorMittal Cleveland Inc.	Cleveland	OH	5	79
18	United States Steel Edgar Thomson Plant	Braddock	PA	5	76
19	Smurfit Stone Container Enterprises	Fernandina Beach	FL	5	76
20	Georgia Pacific - Cedar Springs Paper	Cedar Springs	GA	5	75

¹ In pounds/year.

**Table 7: Baseline Lead Emissions From Industrial Power Plants
Toxic 20 Facilities**

	FACILITY	CITY	ST	RISK	EMISSIONS¹
1	Boise Packaging and Newsprint, LLC - DeRidder Mill	DeRidder	LA	5	6,408
2	HOVENSA LLC	Christiansted	VI	N/A	5,163
3	Grays Harbor Paper, L. P.	Hoquiam	WA	2	4,245
4	Georgia-Pacific Wood Products LLC	Russellville	SC	N/A	3,824
5	American Electric Power John E. Amos Plant	Winfield	WV	5	3,424
6	Georgia Pacific - Cedar Springs Paper	Cedar Springs	GA	5	3,399
7	American Electric Power Rockport Plant	Rockport	IN	5	3,343
8	American Electric Power Gavin Plant	Cheshire	OH	5	3,343
9	Duke Energy Ohio - Wm H. Zimmer	Moscow	OH	5	3,343
10	Arnold Engineering Development Center	Arnold AFB	TN	1	3,298
11	International Paper Riegelwood Mill	Riegelwood	NC	5	3,266
12	American Electric Power Cardinal Plant	Brilliant	OH	5	3,190
13	Alabama River Newsprint Co	Perdue Hill	AL	4	2,887
14	Alcoa Inc. - Warrick Operations	Newburgh	IN	5	2,660
15	Grace Davison	Sulphur	LA	4	2,450
16	Rayonier Performance Fibers--Jesup Mill	Jesup	GA	5	2,417
17	BP Amoco Chemical Co. - Cooper River Plant	Wando	SC	5	2,255
18	International Paper - Augusta Mill	Augusta	GA	5	2,252
19	ADM Clinton Cogeneration	Clinton	IA	N/A	2,119
20	International Paper - Pensacola Mill	Cantonment	FL	5	2,093

¹ In pounds/year.

Table 8: Baseline **Chromium** Emissions From Industrial Power Plants

Toxic 20 Facilities

	FACILITY	CITY	ST	RISK	EMISSIONS¹
1	Georgia Pacific - Green Bay Broadway	Green Bay	WI	5	3,579
2	HOVENSA LLC	Christiansted	VI	N/A	3,397
3	American Electric Power John E. Amos Plant	Winfield	WV	5	2,971
4	American Electric Power Rockport Plant	Rockport	IN	5	2,901
5	American Electric Power Gavin Plant	Cheshire	OH	5	2,901
6	Duke Energy Ohio - Wm H. Zimmer	Moscow	OH	5	2,901
7	Arnold Engineering Development Center	Arnold Air Force Base	TN	1	2,861
8	American Electric Power Cardinal Plant	Brilliant	OH	5	2,768
9	ADM Clinton Cogeneration	Clinton	IA	N/A	2,058
10	BP Amoco Chemical Company - Cooper River Plant	Wando	SC	5	1,957
11	Valdez Marine Terminal	Valdez	AK	N/A	1,746
12	Merck & Co., Inc.	Rahway	NJ	5	1,644
13	ADM Corn Processing CR	Cedar Rapids	IA	5	1,626
14	The Ohio State University	Columbus	OH	N/A	1,614
15	U.S. Marine Corps Base Camp Lejeune	Camp Lejeune	NC	4	1,609
16	American Electric Power Big Sandy Plant	Louisa	KY	5	1,545
17	Citizens Thermal - C.C. Perry K Steam Plant	Indianapolis	IN	N/A	1,416
18	UNITED REFINING COMPANY	Warrant	PA	4	1,197
19	Entergy Gerald Andrus Plant	Greenville	MS	4	1,154
20	Sunoco Philadelphia Refinery	Philadelphia	PA	5	1,098

¹ In pounds/year.

Table 9: Baseline Hydrochloric Acid Emissions From Industrial Power Plants

Toxic 20 Facilities

	FACILITY	CITY	ST	RISK	EMISSIONS ¹
1	MillerCoors Eden, NC Facility	Eden	NC	3	6,862,500
2	THUNDER BASIN COAL_COAL CREEK MINE	WRIGHT	WY	N/A	3,582,273
3	ARCELORMITTAL WEIRTON INC. - Weirton Steel	WEIRTON	WV	5	2,236,795
4	PPG Industries, Inc., Natrium Plant	New Martinsville	WV	4	2,076,613
5	Manistique Papers Inc.	Manistique	MI	3	1,694,040
6	Kodak Park Division/Suez-Duke Energy Generation Services (DEGS) of Rochester, LLC.	Rochester	NY	N/A	1,685,818
7	Duke Energy Generation Services of Narrows, LLC	Narrows	VA	4	1,635,369
8	ADM Clinton Cogeneration	Clinton	IA	N/A	1,512,145
9	Grain Processing Corporation	Muscatine	IA	5	1,503,152
10	John Deere Dubuque Works	Dubuque	IA	4	1,353,529
11	Cargill Inc. Corn Milling Memphis, TN	Memphis	TN	5	1,244,724
12	Citizens Thermal - C.C. Perry K Steam Plant	Indianapolis	IN	N/A	1,236,320
13	Abitibi Bowater Coosa Pines Mill	Childersburg	AL	5	1,214,271
14	Colorado Energy Nations Company, LLLP [BLR-215]	Golden	CO	4	1,209,708
15	Northshore Mining Company	Silver Bay	MN	N/A	1,206,189
16	ADM Corn Processing CR	Cedar Rapids	IA	5	1,195,211
17	International Paper - Augusta Mill	Augusta	GA	5	1,075,460
18	GENERAL MOTORS CORP (Electro Motive Diesel)	LA GRANGE	IL	5	1,039,616
19	Thilmany, LLC	Kaukauna	WI	5	1,007,885
20	Escanaba Paper Company	Escanaba	MI	4	992,817

¹ In pounds/year.

**Table 10: Baseline PM_{2.5} Emissions From Industrial Power Plants
Toxic 20 Facilities**

	FACILITY	CITY	ST	RISK	EMISSIONS¹
1	Georgia-Pacific -Brookneal OSB	Gladys	VA	4	3,049,280
2	Georgia-Pacific - Crossett Paper	Crossett	AR	5	2,159,020
3	International Paper Ticonderoga Mill	Ticonderoga	NY	4	2,036,975
4	Boise Packaging and Newsprint, LLC	DeRidder	LA	5	1,970,482
5	Port Townsend Paper Corp.	Port Townsend	WA	5	1,740,793
6	Dakota Gasification Company - Great Plains Synfuels Plant	Beulah	ND	N/A	1,676,174
7	TIN Inc. - Bogalusa Box Plant	Bogalusa	LA	5	1,638,292
8	Rayonier Performance Fibers--Jesup Mill	Jesup	GA	5	1,481,859
9	Roseburg Forest Products Co. - Dillard Complex	Dillard	OR	5	1,437,474
10	MeadWestvaco Coated Board, Inc.	Phenix City (Cottonton)	AL	4	1,411,152
11	INVISTA, S.a.r.l. – Wilmington	Wilmington	NC	5	1,316,476
12	Georgia Pacific - Cedar Springs Paper	Cedar Springs	GA	5	1,278,629
13	Escanaba Paper Company	Escanaba	MI	4	1,267,701
14	United States Sugar Corporation Clewiston Mill	Clewiston	FL	5	1,237,295
15	John Deere Dubuque Works	Dubuque	IA	4	1,128,352
16	Sugar Cane Growers Cooperative of Florida	Belle Glade	FL	1	1,108,494
17	International Paper-Vicksburg Mill	Redwood	MS	4	1,086,019
18	International Paper Riegelwood Mill	Riegelwood	NC	5	993,738
19	Thilmany, LLC	Kaukauna	WI	5	969,908
20	Alabama River Newsprint Co	Perdue Hill	AL	4	950,755

¹ In pounds/year.

APPENDIX A: State Breakdown of Industrial Power Plants/Facilities

RANK	STATE	# IPPs	# FACILITIES
1	North Carolina	166	52
2	Pennsylvania	99	35
3	South Carolina	91	41
4	Virginia	87	39
5	Indiana	86	30
6	Michigan	84	34
7	Ohio	83	37
8	Wisconsin	72	31
9	Minnesota	68	31
10	Alabama	61	33
11	Illinois	60	26
12	Tennessee	59	21
13	Georgia	55	31
14	Iowa	51	23
15	New York	46	17
16	Missouri	44	18
17	Arkansas	39	24
18	West Virginia	39	15
19	Mississippi	37	21
20	Florida	36	13
21	Maine	36	16
22	Oregon	31	18
23	Kentucky	28	14
24	Louisiana	28	18
25	Texas	26	16
26	U.S. Virgin Islands	23	1
27	Hawaii	20	3
28	Idaho	20	8
29	Washington	19	14
30	California	18	13
31	Massachusetts	14	8
32	North Dakota	14	6
33	Connecticut	13	5
34	Maryland	13	6
35	Wyoming	13	6
36	New Jersey	12	5
37	Alaska	11	3
38	Oklahoma	10	7
39	Nebraska	9	4
40	Montana	8	4

41	Kansas	7	4
42	Colorado	5	2
43	Rhode Island	5	2
44	Delaware	3	1
45	Arizona	2	1
46	Puerto Rico	2	1
TOTAL		1753	758

APPENDIX B: Research Methods

In a presentation issued December 2, 2011, the EPA stated that approximately 1,750 industrial power plants will need to meet emission limits to minimize toxics under the regulation for major source boilers.⁶ The identities of these industrial power plants were determined using appendices to the "Boiler MACT/Impacts Memo & Appendices" at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>, specifically "Appendix A-1: Major Source Boiler and Process Heater Cost Summary for Existing Sources (Recommended Option)" and "Appendix B-1 Emission Reduction Detail for Existing Units (Recommended Option)" from December 2011.

The industrial power plants that must meet emission limits have a design capacity greater than 10 mmBtu/hr and predominantly burn biomass, coal, heavy, light or non-continental liquid fuel or process gas. According to Appendix A-1, there are 487 biomass units, 601 coal units, 293 heavy liquid units, 252 light liquid units, 42 non-continental liquid units and 78 process gas units that are greater than 10 mmBtu/hr, for a total of 1,753 units.

These 1,753 units were next identified in Appendix B-1 and consolidated according to the unique FacilityID field. This indicated that the 1,753 industrial power plants subject to emission limits are located at 758 individual facilities. These facilities were placed in a separate spreadsheet that included the number of each type of industrial power plant by primary fuel (biomass, coal, etc.) located at that facility.

Facility information (name, address, city, state, zip, county) for each facility was obtained from the Data:Facility tab in "Emissions Database for Boilers and Process Heaters Containing Stack Test, CEM, & Fuel Analysis Data Reported under ICR No. 2286.01 & ICR No. 2286.03 (version 7)," a Microsoft Access file under the "Technical Information" section at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>. Using the unique FacilityID, this address information was combined with the aforementioned spreadsheet of 758 facilities that have industrial power plants subject to emission limits.

Latitude and longitude data for each facility came from www.epa.gov/airquality/combustion/docs/Boilers_29APR10.xls. For facilities that weren't included in this spreadsheet, geocoding was used to find coordinates. For the handful of facilities for which that didn't work, searching through Google Maps was used.

⁶ <http://www.epa.gov/airquality/combustion/docs/20111202presentation.pdf>

Baseline emissions for selected pollutants was calculated using numbers in "Appendix B-1: Emission Reduction Detail for Existing Units (Recommended Option)" from December 2011. The individual contributions of each onsite industrial power plant that is subject to emission limits were summed to get a total baseline emissions number for the facility.

APPENDIX C: Industrial Power Plants 101

What is an industrial power plant (a.k.a. industrial boiler)?

Industrial power plants are in-house power plants that burn conventional fuels like coal, biomass, and oil to provide heat to a facility.

What is an incinerator?

Industrial power plants that burn waste are called incinerators. The apparatus that burns material does not change, but what it's called is determined by what it burns.

How to tell an incinerator from an industrial power plant:

Burning Waste = Incinerator

Burning Conventional Fuels = Industrial Power Plant

What is a major source industrial power plant?

A major source industrial power plant is one operated at a facility with the potential to emit 10 tons or more of any single hazardous air pollutant per year, or 25 tons or more of any combination of hazardous air pollutants.

What is an area source industrial power plant?

An area source or non-major industrial power plant is one operated at a facility that is not "major." Many significant and dangerous pollutants, including more than 1,000 chemical plants, are area sources.

What is a hazardous air pollutant (HAP)?

A hazardous air pollutant is one of the pollutants that Congress listed as hazardous in Clean Air Act § 112(b). Congress listed 187 pollutants as hazardous based on their known or suspected ability to cause cancer, reproductive/birth defects or other serious adverse health and environmental effects. **Examples include:** benzene, dioxin, asbestos, mercury, lead and chromium.

How does the EPA standard for industrial power plants impact major sources?

Approximately 14,000 industrial power plants are operated at major sources across the country. For the vast majority of these—more than 12,000 that burn natural gas or are relatively small—EPA's only requirement is to conduct a tune up every two years. Of the remaining 2,000, many are already clean enough to meet EPA's standards. As a result, only the dirtiest and most dangerous industrial power plants will need to take significant measures to control pollution. Because these plants are such significant polluters, however, cleaning up their pollution will substantially reduce toxic pollution in communities across the country and will save thousands of lives every year.

APPENDIX D: About Earthjustice & The Right To Breathe Campaign

Earthjustice is a non-profit public interest law firm dedicated to protecting the magnificent places, natural resources, and wildlife of this earth, and to defending the right of all people to a healthy environment.

Learn more at www.earthjustice.org

The Right To Breathe Campaign

Every time you blow out a candle. Every time you blow a bubble. You declare the right to breathe. Air pollution threatens that right. The Clean Air Act defends it. Clean air should be a fundamental right.

Every year, many Americans young and old get sick because of air pollution. Thousands die. But our lungs don't have to be the dumping ground for dirty industries. The technology to dramatically reduce harmful air pollution is available today, and major polluters should be required to use it. Not a decade from now. Now.

Learn more at www.earthjustice.org/our_work/campaigns/the-right-to-breathe