



The Testimony of Melody Zhang  
March 18, 2019

Proposed Revised Supplemental Finding for the Mercury and Air Toxics Standards and Results of the Residual Risk and Technology Review Agency/Docket Numbers: EPA-HQ-OAR-2018-0794 FRL-9988-93-OAR RIN: 2060-AT99 Document Number: 2019-00936

Good morning. My name is Melody Zhang. I am a Christian and a member of Young Evangelicals for Climate Action. We are motivated by our Christian faith to act as responsible stewards of creation and to protect the abundance and diversity of the fullness of life by advocating for alternatives to fossil fuel energy which are more equitable and just, *for the sake of the most vulnerable among us*. This includes women, children, and the poor. In the US, coal-fired mercury pollution threatens the health and well-being of these people groups most severely, and in disproportionate ways. That is why I am compelled to testify before you today.

In its briefing regarding the changes proposed to be made to the Mercury and Air Toxins rule, the EPA states that the financial cost of regulating hazardous air pollutants for coal & oil-fired power plants to be greater than the financial benefits, and because of this it is no longer “appropriate and necessary” to regulate HAP emissions. It is my understanding that this is the primary reason for removing these standards. As a Christian, I urge you today to consider all of the *real costs* implied in removing these standards, including public health costs to our nation’s vulnerable populations. Real costs are insidious, and cannot be seen immediately, but they multiply over time.

The MATS rule has been extremely effective in its 8 years of implementation. 99.9% of plants are already in full compliance with the rule and because of this, exposure to mercury nationwide has already been reduced by 81%. In fact, prior to MATS Hazardous Air Pollutants installment, 1 in 6 babies born were exposed to alarming amounts of mercury, and it is reported that the implementation of this guideline saves approximately 11,000 lives every year. As such, there has been unusually intense opposition to this proposed rule change from all ends of the political spectrum, and for good reason.

I am here to remind you that mercury is a highly potent neurotoxin that, when ingested by pregnant women, crosses the placenta and results in **irreversible brain damage** in unborn children. **There are no known safe levels of mercury.** **This means that any amount of exposure** to mercury is a real threat to the development of any child in utero and early in life. Even for adults, any amount of exposure to mercury can have toxic effects on the nervous, digestive, and immune systems, and can trigger tremors, memory loss, cognitive and motor dysfunction. It can be fatal. No wonder it is listed by the World Health Organization as one of the top 10 chemicals of major public health concern.

I call Detroit my home. As some of you may know, there is a zip code in Detroit well-known for being the most polluted area in the entire state of Michigan, and that is 48217. They are my neighbors. Over the last 8 years, they have benefited from the HAP MATS rule and were able to breathe in cleaner air because of it. Now 44% of them live in poverty, 82% are black, and 100% of them will have their livelihoods jeopardized if this life-saving standard is removed. I cannot sit idly by and watch my neighbors bear the brunt of this rule change. I must speak up for them because this is a classic issue of environmental justice.

EPA, your very mission is to protect human health & the environment. When I hear the words protecting human health, I think of the example of Jesus, who both proclaimed and demonstrated the gospel by performing acts of spiritual and *physical* healing. Jesus always acted out of compassion for and intentionally went towards the overlooked and under-heard. Each person conceived is of inherent and equal value and dignity, and all human life is worthy of protection. We must make more of an effort to care for all of life.

Today I challenge you to live up to your mission by keeping the hazardous air pollutants rule for the sake of the flourishing of our neighbors, our children, and ourselves. Doing the opposite of this could only be called irresponsible and reckless. Today I urge you to respond compassionately. I believe this act will be paid back tenfold.

Thank you.