

Environmental Defense · Pamlico–Tar River Foundation · Clean Water for North Carolina

Wednesday, February 05, 2003

Dear Air Quality Committee Members,

We are aware of the potential for a rulemaking involving emissions of the toxic pollutant Hydrogen Sulfide (H₂S). We would like to thank you for your diligent efforts to protect the health of North Carolina citizens from the harmful effects of this toxic pollutant. North Carolina citizens have been exposed to unhealthy levels of this pollutant for far too long, suffering asthma attacks and withstanding the noxious odor in their communities and neighborhoods. We urge you to move forward with the rulemaking without delay, adopting the 1-hour Ambient Air Level (AAL) of 56 µg/m³ and the 24-hour AAL of 33 µg/m³, both of which have been recommended by the North Carolina Division of Public Health (NCPH) and the Scientific Advisory Board (SAB). We request that you respect the well-documented studies put forth by the NCPH and the SAB and vote on this issue as expeditiously as possible.

Indeed, there is no reason to delay.

We know the problem. The dangers of this pollutant have been identified. We recognize that studies by the SAB, NCPH and many others have revealed the health threat that is posed from hydrogen sulfide emissions. We now know that this pollutant not only plagues communities with an offensive odor but also puts asthmatics at risk of an asthma attack and exposes people to eye irritation and pain from exposure. The recent study from NCPH found that the impacts of H₂S exposure from three source categories in our state at levels above 56-µg/m³ per hour include an increase in the number of asthma attacks, and an increase in asthma related hospital visits and ER visits. The total cost of these impacts is estimated at approximately \$151,300,456 per year. Based on these findings, the NCPH recommends adopting two of the guidelines put forth by the SAB: the 24-hour AAL of 33 µg/m³ and the 1-hour AAL of 56 µg/m³. We urge you to act on their well-founded recommendation.

The NCPH analysis found that the following impacts may occur as a result of exposure to H₂S from the three major source categories at levels above the recommended 1-hour AAL of 56-µg/m³:

- 228,285 asthma attacks per year (with an estimated total cost of \$9,311,740)
- 18,225 asthma related hospitalizations per year (estimated cost of \$120,904,650)
- 70,605 asthma related ER visits per year (estimated cost of \$21,084,066)
- 395,991 people per year at risk of eye pain and visual disturbances (unable to estimate cost)

We have all the evidence we need. The studies conducted by the SAB and the NCPH are unbiased, and use standard, well-accepted methods of calculations. There is no reason to pursue another standard that would be less protective of human health simply because industry is questioning the legitimacy of the SAB's conclusions and proposing changing assumptions that would lead to a less strict standard.

We know the cause. The sources of this pollutant have been identified. We have the data and we know that a phosphate mining and fertilizer facility, pulp and paper mills, and asphalt distribution terminals are responsible for human health impacts from H₂S emissions. Although not the only sources of H₂S emissions in our state, the existence of other sources of this pollutant does not detract from the human suffering that has been associated with H₂S emissions from these facilities. Now that we know the causes of the problem we can move forward with requiring these facilities to responsibly account for their dangerous emissions.

We have the technology available. The technologies necessary to protect the public from harmful levels of this pollutant are readily available. It is well within the reach of industry to control this toxic pollutant economically.

In conclusion, we respectfully and strongly urge you to take the necessary steps required to adequately protect public health. We request that you expeditiously move forward with adopting the SAB and NCPH recommended guidelines. Thank you for your consideration in this matter.

Sincerely,

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