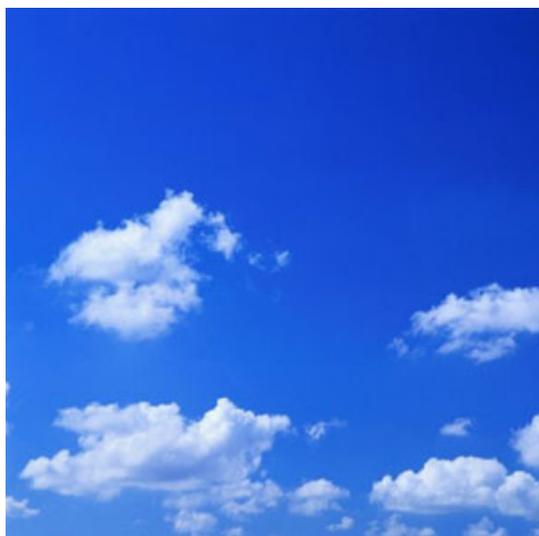


Clean Air Doesn't Necessarily Make It Easy to Breathe

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Starting in the 60s and continuing through the 90s, the Environmental Protection Agency composed a series of Clean Air Acts which strengthened the regulation of air pollution. In 1990, the ozone threshold was 125 parts per billion, which was measured as a one-hour average concentration. Several years later it was determined that one-hour ozone standards did not fully protect public health. The emphasis then shifted to prolonged ozone exposure, resulting in a reduction from 125 ppb to 84 ppb over the course of an eight-hour measurement. 2008 brought another reduction, making the magic number 75 ppb.

That brings us to today. Proposed is the reduction of the national primary ozone standard from 75 ppb to 60 ppb. This primary standard aims to protect public health, where 70 ppb would be the absolute maximum when measured over eight hours. A secondary standard aims to protect the environment. Overall, this proposal comes two years after the reduction to 75 ppb, and technically, a re-evaluation of the standards isn't necessary until 2013. So why jump the gun?

The rationale behind this proposal is to produce cleaner, safer air for our cities and, more importantly, our citizens. EPA claims that the health benefits will range between \$13 and \$100 billion dollars. That's quite a substantial range. The numbers are so vast that they almost come across as arbitrary. Am I to understand that it could help a whole heck of a lot or help less than anticipated? Or that some years it could be more effective than others? Apparently, the stricter standards will prevent 12,000 premature deaths a year in the United States. Not to sound callous, but that's it? One would think that tightening the bootstrap would result in more impressive numbers.

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Health talk aside, while stringent air standards sound good—who doesn't want clean air?—the costs to implement the necessary outfitting ranges between \$19 and \$90 billion. Coupled with the projected economic implications of the standard, which include estimated job losses at 7.3 million by 2020 and a \$676.8 billion reduction in GDP, this “saintly” standard is completely devastating to the manufacturing sector.

Manufacturers will have to make substantial adjustments to their current operations in order to manage their emissions, utilizing emissions-measuring software, filters and restructured procedures, to name a few. And as estimated in the numbers above, accommodating for tighter standards doesn't come cheaply. Additionally, states with the biggest stake in manufacturing and refining, such as Texas and California, will be affected the most. Production costs will increase and the slow growth of domestic markets will combine to illuminate the advantages of moving abroad where the regulations aren't as stringent.

Ultimately, the opportunity costs of attaining cleaner air snowball out of control and leave consumers and manufacturers in the dust, or should I say smog? Your air may be cleaner, but the sacrifices are a lot dirtier. What it ultimately comes down to is simple economics: The cost of an alternative that must be forgone in order to pursue a certain action. Here, industries lose time, money, employees and, in possible cases, the ability to remain stateside. Not to be forgetting the fact that if they can't meet the new standards, they will be censured, usually in the form of fines and ultimatums.

This year it's a proposed 60-70 ppb. What's it going to be two years from now? When will the line of alienation be drawn, or has it already? Many claim that this is the straw that's breaking the manufacturer's back, and at this point, I'd have to agree. EPA is asking a lot to gain what I see as a little. And in my economic model, that's just not good enough.

What are your thoughts? Let me know via e-mail at lauren.kiesow@advantagemedia.com [1].

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