

Under Attack: Vital Clean Air Safeguards and Historic Investments

EPA, Congress, and President Trump have reversed course and left America less healthy and breathing dirtier air

Updated October 2025

By 2055, analysis indicates the retrenchments taken, in progress, and planned by Congress, President Trump, and EPA Admin Zeldin¹ will, cumulatively:

- Produce between **22 and 32 billion metric tons of climate pollution**— over 4 times the emissions from the entire U.S. today
- Result in between **220,000 and 340,000 premature deaths**
- Lead to between **53 and 68 million missed school and workdays**
- Deliver net costs between **\$3.1 and \$6.7 trillion**

BACKGROUND

Since the beginning of the year, EPA Administrator Zeldin has executed plans to attack dozens of the nation's most successful and vital environmental protections addressing pollution – pollution limits that have saved lives, protected millions from severe health problems, and helped Americans save money on fuel bills and health care costs.

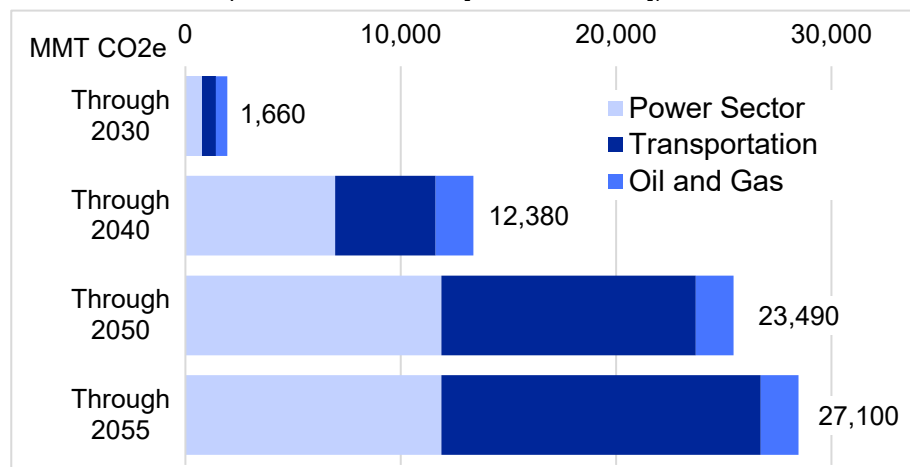
At the same time, Congress and the Trump Administration have eliminated or substantially weakened many of the clean energy tax credits undermining unprecedented investment and job growth in American manufacturing. Reversing

course on these investments and clean air standards has put American leadership and job growth at risk, increased costs for consumers, and exposed communities to more harmful pollution that causes sickness and early death.

The harms to climate, public health, and job growth are enormous. This report analyzes the emissions increases, health outcomes, and monetized harms of the actions taken, in progress, and planned by EPA Administrator Zeldin, the Trump Administration, and Congress.

Figure 1: Cumulative Carbon Pollution Increases from Reversing Course on Clean Air Actions

(Source: EPA, EDF [100-GWP AR5])



*The average of the low and high emissions increase estimate for Transportation are shown in the figure

POLLUTION IMPACTS

The actions¹ this report addresses span three major pollution sources: Transportation, Power, and Oil & Gas. As shown in Figure 1, these actions significantly increase climate pollution – between **11.3 to 13.5 billion metric tons** by 2040 and between **22.3 and 31.5 billion metric tons** by 2055. This is equivalent to more than 4 times the annual emissions from the entire U.S. today.²

Collectively, through 2055, the U.S. would also see a substantial increase of health-harming pollution:

- **710,000 to 990,000 tons** of fine particulate matter (PM_{2.5})
- **12.2 to 14.9 million tons** of nitrogen oxides (NO_x)
- **3.3 million tons** of sulfur dioxide (SO₂)
- **21 to 23 million tons** of volatile organic compounds (VOCs)

HEALTH HARMS

To quantify the health harms that would result from attacks on these vital safeguards, we applied [national incidence-per-ton factors](#) to the different source categories. This resulted in changes in health outcomes for each emission source for each rule. For more discussion, see the methodology document.

Using this methodology, we estimate the actions taken, in progress, and planned by Congress, Trump, and Zeldin would result in an additional:

- **220,000 to 340,000** premature deaths
- **340,000 to 490,000** hospital and ER visits
- **150 to 190 million** asthma attacks
- **53 to 68 million** lost workdays and school absences

Table 1 shows these health impacts by sector.

Table 1: Cumulative Health Harms from Undoing Major Clean Air Actions

Sector	Premature deaths	Hospital and ER visits	Cases of asthma symptoms (million)	Lost work / school days (million)
Power	95,000	150,000	58	21
Transportation	100,000 - 150,000	190,000 - 250,000	82 - 110	29 - 40
Oil and Gas	3,200	8,000	4.3	1.6
PM _{2.5} NAAQS	23,000 - 90,000	19,000 - 71,000	3.3 - 16	1.2 - 5.8
TOTAL	220,000 - 340,000	340,000 - 490,000	150 - 190	53 - 68

¹ The action include attacks on select IRA clean energy tax credits and vital clean air safeguards including: EPA Endangerment and Cause or Contribute Findings for Greenhouse Gases; EPA Mercury and Air Toxics Standards for Power Plants; EPA New Gas and Existing Coal GHG Standards; EPA Good Neighbor Plan for 2015 Ozone; EPA Heavy-Duty NO_x standards for MY27 and later vehicles; EPA Light-Duty GHG Standards, MY23-26; EPA Heavy-Duty GHG Standards, MY27-32; EPA Light/Medium-Duty Multipollutant Standards, MY27-32; Preemption Wavier on Advanced Clean Trucks; EPA Methane Standards for New and Existing Oil and Gas Sources; EPA Methane Waste Emission Charge; and Particulate Matter NAAQS.

² Throughout this report, we used [EDF's modeling](#) of the impacts of repealing the Endangerment Finding and vehicle GHG standards. For more information about how this was integrated in EPA modeling, see the [Methodology](#) documentation.

For more information, please contact Sharyn Stein, sstein@edf.org

Table 2: Monetized Harms From Undoing Major Clean Air Standards (BILLION 2022\$)

Sector	Years	Health Costs	Climate Costs	Net Costs
Power	2023-2047	\$380	\$320	\$660
Transportation	2023-2055	\$600 - \$740	\$1,700 - \$3,900	\$2,300 - \$5,300
Oil and Gas	2024-2038	\$8	\$125	\$111
PM _{2.5} NAAQS	2032-2051	\$640	\$0	\$630
TOTAL		\$990 to \$1,800	\$2,100 to \$4,300	\$3,100 to \$6,700

value and uses either a 2% or 3% discount rate depending on what value was used by the agency in its analysis.

MONETIZED HARMS

In their extensive assessment of regulatory actions, agencies quantify the costs and benefits, including compliance costs, health impacts, climate impacts, and fuel and maintenance costs or savings for consumers. Table 2 shows the costs Americans will bear as a result of the actions already taken, in progress, and planned. By 2055, the U.S. would incur between **\$3.1 and \$6.7 trillion** in net costs, including at least \$1 trillion in health costs and \$2.1 trillion in climate costs. The estimate is in present

HAZARDOUS AIR POLLUTION

Between 2021-2024, EPA finalized new cost-effective standards to reduce hazardous air pollutant (HAP) emissions from nine industries. HAPs include dozens of toxic pollutants that are dangerous to human health at any level including mercury, arsenic, benzene, and more. Many are carcinogenic and cause significant harm to developing fetuses and children. Combined, EPA estimates these standards would reduce hazardous air pollution from impacted facilities by **17 million pounds per year**.

EPA Administrator Zeldin and the Trump Administration have already begun their assault on these critical health protections. Administrator Zeldin [launched a website](#) inviting the industrial sources covered by nine different rules to seek two-year extensions to their deadlines to comply with critical air toxics standards. President Trump has now issued multiple proclamations exempting polluters from complying with standards for two years with little public explanation: over 170 facilities including coal-fired power plants, chemical manufacturing facilities, medical sterilizers, taconite processing facilities, and copper-smelters.

The nine industries covered by the recent standards include:

- Coal power plants
- Chemical manufacturing
- Commercial sterilizers
- Coke ovens
- Steel production
- Rubber processing
- Taconite iron ore processing
- Lime manufacturing
- Copper smelting

For several of the industries including [steel](#) and [coke ovens](#), EPA delayed the compliance dates on vital clean air protections without any public input.

For additional information, see [Methodology](#).

For more information, please contact Sharyn Stein, sstein@edf.org

Environmental Defense Fund
257 Park Avenue South
New York, NY 10010

A vital Earth. For everyone.
EDF.org
T 212 505 2100