

## COMMENTS ON PROPOSED NATIONAL AMBIENT AIR QUALITY STANDARDS FOR OZONE

### Background

The Environmental Protection Agency (EPA) proposed lowering the primary National Ambient Air Quality Standards (NAAQS) for Ozone (O<sub>3</sub>) in March of 2008 from 0.084 parts per million (ppm) to 0.075 ppm. The new administration chose to reconsider the new standard before the rule became final; however, the 8-hour O<sub>3</sub> standard was lowered to 0.80 ppm. EPA is now proposing to strengthen the primary standard within the range of 0.060 ppm and 0.070 ppm and have asked for comments on the proposal.

### Current Situation

The proposed 0.060 to 0.070 ppm range places more weight on key scientific and technical information, including epidemiological studies and human clinical studies. The O<sub>3</sub> standards proposed in 2008 were not as protective as was recommended by EPA's panel of science advisors, the Clean Air Scientific Advisory Committee (CASAC), who concluded that the 8-hour O<sub>3</sub> level should not exceed 0.70 ppm. The current proposed range of standards is consistent with the CASAC recommendations.

Current data shows the region is currently meeting the 0.080 ppm standard. However, strengthening the O<sub>3</sub> standards to the 0.060 to 0.070 ppm range will cause the HGB area to continue to be a nonattainment area, and extend the additional compliance responsibilities, such as being subjected to SIP procedures.

The Regional Air Quality Planning Committee (RAQPC) believes that the 0.060 to 0.070 ppm range is based on scientifically sound recommendations from the EPA Clean Air Science Advisory Committee to protect the public. However, certain issues need to be considered by the EPA when determining a specific number within this range:

- Regional O<sub>3</sub> background levels.
- Previous and current O<sub>3</sub> reduction caused by emission reduction efforts and investments.
- The need for additional resources and funding, and the added competition to obtain the resources and funding.
- Coordination from the Federal Level concerning national industrial standards and changing pollutant standards.
- The time frame needed to implement successful processes to achieve attainment.

### Action Requested

Request authorization to submit comments to the Environmental Protection Agency on the proposed National Ambient Air Quality Standard for Ozone consistent with the positions explained above.