

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 (O₃) 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 O₃ standard was lowered to 0.80 ppm. On January 19, 2010, EPA proposed to revise the 8-hour standard somewhere in the range of 0.060 ppm to 0.070 ppm O₃, and have asked for comments on the proposal.

Current Situation

The ozone 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 ozone level should not exceed 0.070 ppm. The CASAC evaluated ozone levels in relation to protection of human health, and determined that the ozone range of 0.060 ppm to 0.070 ppm will provide adequate protection.

Current data shows the region is currently meeting the 0.080 ppm standard. However, strengthening the ozone standards to the 0.060 ppm 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) recognizes the need to protect human health and supports EPA's effort to set a primary ozone standard that protects human health with an adequate margin of safety, as required by the Clean Air Act. Once EPA has selected a standard in the 0.060 ppm to 0.070 ppm range, H-GAC recommends that the following be considered for implementation:

- Need for more guidance on background levels
- Regional progress in reducing ozone levels to date
- Added competition for resources
- A disconnect with federal engine standards and the SIP process
- Consideration of workload for local, state, and federal agencies

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.