
Houston-Galveston Area Council

October 1, 2007

Docket No. EPA-HQ-OAR-2005-0172
Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Comments on proposed rule "National Ambient Air Quality Standards for Ozone", Docket ID No. EPA-HQ-OAR-2005-0172

Via: email to A-and-R-Docket@epa.gov and to address above

To Whom It May Concern:

The Houston-Galveston Area Council (H-GAC) Board of Directors would like to offer comments for the Environmental Protection Agency proposed rule, "National Ambient Air Quality Standards for Ozone," also referred to as Docket ID No. EPA-HQ-OAR-2005-0172.

Comments are as follows:

1. The EPA is recommending a range of 70.0-75.0 ppb for the standard and is also taking comments on a larger range from the Clean Air Scientific Advisory Committee recommendation of 60.0 ppb to the existing standard of 84.0 ppb. This leaves the current standard open for re-approval. In the proposal, the EPA has stated that the current 8-hour standard is not adequately protective to human health. If this proves to be correct after public comment is considered, the current standard should not be retained.
2. If the EPA implements a revision to the current 8-hour ozone standard, the requirements of the current standard should remain in effect for current non-attainment areas to avoid backsliding.
3. If the EPA implements a revision to the current 8-hour ozone standard, early action compacts should be an available option for eligible areas to encourage early action to prevent non-attainment.
4. Because mobile source emission reductions are critical to attaining ozone standards, the EPA should expedite the process of implementing more stringent mobile source emissions controls.

We greatly appreciate the efforts of the EPA to draft this proposed rule.

Thank you for your time and consideration.

Sincerely,

Addie Wiseman
H-GAC Chair
Council Member, City of Houston

Comment: This may change before it is mailed.

cc: EPA Region 6
TCEQ Commissioners