

Metropolitan Washington Air Quality Committee

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September 14, 2009

EPA Docket Center No. EPA-HQ-OAR-2006-0922
United States Environmental Protection Agency
Mail code 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

I am writing on behalf of the Metropolitan Washington Air Quality Committee (MWAQC) regarding EPA's Proposed Primary National Ambient Air Quality Standard (NAAQS) for Nitrogen Dioxide. MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop regional air pollution control strategies for the Washington, DC-MD-VA region.

MWAQC supports the proposal to establish a new short-term hourly NO₂ standard based on the 3-year average of the 99th percentile of the annual distribution of daily maximum 1-hour average concentrations. The hourly standard is important to provide protection against short-term exposure to nitrogen dioxide. Research demonstrates there are health risks to asthmatics from short-term exposure. The proposed standard of 100 ppb or lower will limit peak concentrations and reduce the public health risk to respiratory systems.

MWAQC supports the proposal to monitor roadside concentrations of NO₂, as these concentrations are much higher than average urban concentrations. The at-risk population affected by NO₂ concentrations near major roadways includes people who live, work or attend school near major roadways.

We are concerned about the cost of establishing a roadside monitoring network as state and local governments in the Metropolitan Washington region are operating under severe financial constraints. We urge EPA to fund the monitoring network, particularly in urban areas where it is needed the most.

Thank you for considering our concerns about the proposed NO₂ standard.

Sincerely,

Phil Mendelson, Chair
Metropolitan Washington Air Quality Committee