

Summary of Public Comments - 2015 Ozone NAAQS
(Washington, DC, January 29, 2015)

EPA proposed a new ozone national ambient air quality standard (NAAQS) on November 25, 2014. EPA proposed a range of 70 ppb-65 ppb for both primary and secondary standards to protect public health and public welfare respectively. EPA invited comments from the public on the proposed range in addition to a level as low as 60 ppb and retaining the current level of 75 ppb. As part of the public comment process, EPA held a public hearing on January 29, 2015 in Washington, DC. A number of people commented in their individual capacities and on behalf of their organizations. COG staff attended the public hearing and compiled a few comments made. Below is the summary of those comments.

National Association of Clean Air Agencies (NACAA)

- Supported the new primary ozone NAAQS as proposed.
- Still reviewing the proposed secondary ozone NAAQS, will provide written comments.
- Cited various research studies related to ozone exposure and its impact on human health to justify the support for the 60 ppb level instead of the proposed 70ppb-65 ppb.
- Suggested EPA to:
 - 1) propose the ozone implementation rule at the same time it finalizes the NAAQS revisions and finalize the implementation rule no later than one year following proposal,
 - 2) adopt, or further strengthen, federal measures to control a range of emission sources, and
 - 3) request additional federal funding for state and local agencies to enable them to successfully fulfill their statutory obligations to attain the more protective ozone standards.

American Lung Association

- Supported the new ozone NAAQS at the 60 ppb level.
- Cited various research studies related to ozone exposure and its impact on human health to justify the support for the 60 ppb level instead of the proposed 70ppb-65 ppb.

American Petroleum Institute

- Opposed the new proposed ozone NAAQS range.
- Cited limitations and the lack of significance in the health studies.
- Opposes imposing more requirements on states and businesses since the current 75 ppb level has not been met in many areas in the country.
- Lowering the standard could put significant impact (cost, job loss) on the businesses.
- Due to the existing peak background ozone levels approaching 70 ppb, lowering of the standard would impose unachievable emission reduction requirements on many parts of the nation. Even pristine areas such as, national parks would be out of attainment. Unattainable standards are not smart public policy.

Sierra Club

- Supported the new ozone NAAQS at the 60 ppb level.
- Urged EPA to change the concentration levels for code orange and code red accordingly to protect children and other vulnerable groups.

Individuals

- Several individuals supported the new ozone NAAQS as proposed citing the health concerns ozone poses.