

DRAFT

Metropolitan Washington Air Quality Committee

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September 10, 2007

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

Dear Administrator Johnson:

On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), I am writing to comment on the proposed National Ambient Air Quality Standards (NAAQS) for ground-level ozone. MWAQC has been designated under Section 174 of the Clean Air Act (CAA), to develop a strategy for attaining Federal air quality standards in the Washington region. This assignment is carried out through a partnership among the States of Maryland and Virginia and the Government of the District of Columbia, and the region's local governments in the non-attainment area.

The CAA requires the U.S. Environmental Protection Agency (EPA) to review and revise periodically, as appropriate, the criteria and the NAAQS for "criteria pollutants," including ozone. The CAA also requires that the Clean Air Science Advisory Committee (CASAC) recommend to the EPA Administrator any new NAAQS and revision of existing criteria and standards, as may be appropriate.

The USEPA's health and welfare expert advisory committee, the CASAC determined there was "no scientific justification for retaining" the existing 8-hr health standard. They unanimously recommend the health standard in the range of 0.060 ppm to 0.070 ppm and set a secondary standard to protect vegetation over the growing season. We recommend you set the health standard within this recommended range and set a protective secondary standard. MWAQC also recognizes that ozone reductions can limit crop damage which could increase the potential for carbon sinks.

The CAA sets forth, as affirmed by the U.S. Supreme Court, that the NAAQS shall be set at levels necessary to protect health and welfare, with an adequate margin of safety and without consideration of economic impacts. Cost considerations only apply when selecting air quality improvement strategies to meet any new or revised primary and secondary standards. While we are concerned with the impacts to our economies, we are also concerned with the health and welfare of our citizens and health care costs.

In view of the potential impact the new standard will have on the states in the region for increased monitoring and additional new nonattainment areas, MWAQC requests that EPA develop and implement new efficient control measures to meet the new standard. Also, we

urge EPA to provide sufficient time and flexibility in the implementation rules for developing SIPs and also for attaining the new standard.

The CAA calls on EPA to rely heavily on the science and CASAC's recommendations in setting both the primary and secondary NAAQS. MWAQC supports the work of the CASAC and urges EPA to give great weight to the recommendations of the CASAC, as set forth in its March 26, 2007 letter to the EPA Administrator, for a revision of the ozone NAAQS.

Sincerely,

Nancy Floreen, Chair
Metropolitan Washington Air Quality Committee