

# EPA PROPOSAL - NATIONAL AMBIENT AIR QUALITY STANDARD FOR OZONE

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Steve Walz  
Environmental Programs Director

MWAQC  
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# EPA Proposal

- Retain the current primary and secondary 8-hour ozone standards published in 2015 of 70 parts per billion, (ppb)
  - Primary standard: Public health
  - Secondary standard: Public welfare (animals, crops, vegetation, & buildings)

# EPA Basis for Retaining Standards

- Based on
  - Information contained in the Integrated Science Assessment
  - Quantitative exposure/risk analyses and policy evaluations
  - Advice from the Clean Air Science Advisory Committee (CASAC)
  - Public input
- Exposure-based assessment
  - Updates made to the air quality data, models, model inputs, and underlying databases
  - Used new evidence of metabolic effects from short-term exposure to ozone and concluded that existing standard also provides protection from metabolic effects

# CASAC's Opinion

- The currently available evidence was generally similar to that available in the last review when the standard was set
- Primary standard
  - Six members of CASAC concluded that the primary standard should be retained
  - One expressed support for a lower standard expressing concerns about the safety margin provided by the current standard (2014 review found 70 ppb provides little margin of safety for public health, particularly for sensitive subpopulations)
- Secondary standard
  - All members agreed current evidence supported retaining without revision

# Ozone NAAQS Review Process

- Previously CASAC received expertise from the CASAC Ozone Review Panel
  - CASAC members
  - Outside public health researchers, and
  - Experts on air quality welfare impacts (agriculture, forest, and vegetation)
- 2020 NAAQS review process did not include such an expert panel
- EPA did not include recent studies showing cardiovascular impacts could occur at ozone levels lower than current ozone standards
- Current review unlike previous reviews did not address environmental health risks that may have a disproportionate effect on children
- Current review is lacking in its consideration of new research concerning susceptible populations such as, children and outdoor workers with asthma, and older adults.

# Comments on Proposal

- EPA soliciting comment on the proposed decision to retain current standards, without revision
- EPA also soliciting comment on issues associated with the review of current standards
  - Public health and welfare
  - Science policy judgments
- Last date for comments - October 1, 2020
- 2 Virtual public hearings
  - August 31, 2020
  - September 1, 2020

# Draft MWAQC Comment Letter

- MWAQC TAC recommends MWAQC send a comment letter to:
  - Express concern with EPA's expedited review process and lack of consideration of recent studies showing adverse health impacts on a level below the current NAAQS
  - Express concern with little margin of safety for the protection of public health, particularly for sensitive subpopulations such as, children, and outdoor workers with asthma, and older adults.
  - Request EPA to withdraw the proposed rule, start a broader review process with a newly constituted CASAC Ozone Review Panel, and consider information available in recent studies