

Metropolitan Washington Air Quality Committee

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March 4, 2015

Administrator Gina McCarthy
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Mail code 28221T
Washington, DC 20460
Docket ID No. EPA-HQ-OAR-2008-0699

Dear Administrator McCarthy:

On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), I am writing to comment on the proposed revisions to the National Ambient Air Quality Standards (NAAQS) for ozone. MWAQC was designated in 1992 under Section 174 of the Clean Air Act (CAA), to develop regional air quality plans for attaining Federal air quality standards in the Washington region. We have done so successfully over the past twenty three years. This assignment is carried out through a partnership among the States of Maryland and Virginia and the District of Columbia, and the region's local governments in the non-attainment area.

MWAQC supports the range of the proposed ozone standard, 65-70 parts per billion (ppb) as being more protective of human health and the environment. We are pleased that EPA's recommended standard is consistent with the Clean Air Scientific Advisory Committee's (CASAC) recommendations made in 2014. We also note that CASAC, in its June 26, 2014 letter to the EPA Administrator, included a standard down to 60 ppb and that the committee found with a 70-ppb standard, there is "substantial scientific evidence of adverse effects ... including decrease in lung function, increase in respiratory symptoms, and increase in airway inflammation".¹

The new standard will pose a fresh challenge to the metropolitan Washington region. On the worst days of summer, transported pollution concentrations can exceed the levels proposed for the standard. MWAQC has and will continue to adopt all feasible control programs at the local level, however, it is imperative that EPA help the states and local governments meet the new standards by providing assistance and adopting national rules as part of a national strategy to address pollution – particularly as it relates to pollution that does not originate in our region.

Thank you for taking our concerns into consideration as EPA finalizes the new standard in the coming months.

Sincerely,

¹ Letter from CASAC to U.S. EPA Administrator Gina McCarthy Regarding: CASAC Review of the EPA's Second Draft Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards. June 26, 2014. Online at [http://yosemite.epa.gov/sab/sabproduct.nsf/5EFA320CCAD326E885257D030071531C/\\$File/EPA-CASAC-14-004+unsigned.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/5EFA320CCAD326E885257D030071531C/$File/EPA-CASAC-14-004+unsigned.pdf)

David Snyder, Chair
Metropolitan Washington Air Quality Committee

cc: MWAQC Members
COG Board of Directors
Governor Hogan, Governor McAuliffe, Mayor Bowser

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