

Metropolitan Washington Air Quality Committee

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September 21, 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:

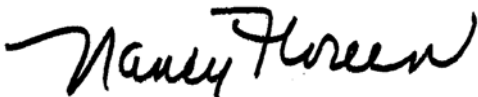
On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), I am writing to comment on the proposed National Ambient Air Quality Standards (standard) for ground-level ozone. MWAQC has been designated under Section 174 of the Clean Air Act (Act), to develop a strategy for attaining federal 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 Act requires the U.S. Environmental Protection Agency (EPA) to review and revise periodically, as appropriate, the criteria and the standards for "criteria pollutants," including ozone. The Act also requires that the Clean Air Science Advisory Committee (Advisory Committee) recommend to the EPA Administrator any new standard and revision of existing criteria and standards, as may be appropriate.

The Act calls on EPA to rely heavily on the science and Advisory Committee's recommendations in setting both the primary and secondary standards. We note that the Advisory Committee has concluded that there was "no scientific justification for retaining" the existing 8-hr health standard. The Act also sets forth, as affirmed by the U.S. Supreme Court, that the standard shall be set at levels necessary to protect health and welfare, with an adequate margin of safety and without consideration of economic impacts.

MWAQC urges EPA to establish a new ozone health standard that is protective of public health based on sound science, and to set a protective secondary standard. MWAQC requests that EPA provide sufficient time and flexibility for state implementation.

Sincerely,



Nancy Floreen, Chair
Metropolitan Washington Air Quality Committee