

September 23, 2020

Administrator Andrew Wheeler
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
Docket ID No. EPA-HQ-OAR-2018-0279

RE: Proposed Retention of the Current National Ambient Air Quality Standards (NAAQS) for Ozone

Dear Administrator Wheeler:

On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), I am writing to comment on the proposed retention of the current 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-eight 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 is concerned that EPA followed an expedited process for the review of the ozone NAAQS. For this reason, EPA was not able to include a number of recent research studies in its review such as, cardiovascular impacts that could occur at ozone levels lower than current ozone standards.^{1,2,3} Likewise, EPA did not address environmental health risks that may have a disproportionate effect on children. The current review is lacking in its consideration of new research concerning susceptible populations such as, children and outdoor workers with asthma, and older adults. EPA seems to have relied significantly on the past research pursued as part of the previous (2015) ozone NAAQS review and discounted new available evidence.

It is important to mention that the Clean Air Scientific Advisory Committee (CASAC) had previously noted a level of 70 ppb provides little margin of safety for the protection of public health, particularly for sensitive subpopulations.⁴ For this reason, the previous CASAC had recommended a range from 60 ppb to 70 ppb. The above concern was also shared by a part of the current CASAC, which agreed with the previous CASAC's concerns about the margin of safety at a level of 70 ppb.⁵ MWAQC requests EPA to consider the advice from both previous and a part of the current CASAC while finalizing the ozone NAAQS.

MWAQC also notes that EPA did not provide an opportunity to receive advice from the CASAC Ozone Review Panel, which was part of the previous reviews. It brought specific expertise through its

¹ Day DB, Xiang J, Mo J, Li F, Chung M, Gong J, Weschler CJ, Ohman-Strickland PA, Sundell J, Weng W, Zhang Y, Zhang JJ. 2017. Association of ozone exposure with cardiorespiratory pathophysiologic mechanisms in healthy adults. *JAMA Intern Med* 177(9):1344-1353.

² Meng Wang, Paul D. Sampson, Lianne E. Sheppard, James H. Stein, Sverre Vedal, and Joel D. Kaufman 2019. "Long-Term Exposure to Ambient Ozone and Progression of Subclinical Arterial Disease: The Multi-Ethnic Study of Atherosclerosis and Air Pollution." *Environmental Health Perspectives*.

³ Gan WQ, Allen RW, Brauer M, et al Long-term exposure to traffic-related air pollution and progression of carotid artery atherosclerosis: a prospective cohort study *BMJ Open* 2014;4:e004743. doi: 10.1136/bmjopen-2013-004743.

⁴ Clean Air Scientific Advisory Committee. CASAC Review of the EPA's Second Draft Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards. Letter to EPA dated June 26, 2014. Available 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).

⁵ Review of the Ozone National Ambient Air Quality Standards, *Federal Register* / Vol. 85, No. 158 / Friday, August 14, 2020, pp 49868.

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involvement of CASAC members, outside public health researchers and other experts in the field of public health and welfare. Therefore, MWAQC requests EPA to consider broadening the scope of the review process by constituting and receiving advice from such a panel.

For the reasons mentioned above, MWAQC requests EPA to withdraw the proposed rule, start a broader review process by using the advice from a newly constituted CASAC Ozone Review Panel, and consider information available in recent studies such as the ones mentioned above for proposing the new ozone NAAQS.

Thank you for providing the opportunity to comment on the proposed rule. Please contact Steve Walz, COG's Director of Environmental Programs at (202) 962-3205 or swalz@mwkog.org if you have any questions.

Sincerely,

Brandon Todd, Chair
Metropolitan Washington Air Quality Committee