

Metropolitan Washington Air Quality Committee

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September 14, 2009

EPA Docket Center No. EPA-HQ-OAR-2006-0922
United States Environmental Protection Agency
Mail code 6102T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

I am writing on behalf of the Metropolitan Washington Air Quality Committee (MWAQC) regarding EPA's Proposed Primary National Ambient Air Quality Standard (NAAQS) for Nitrogen Dioxide (NO₂). MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop regional air pollution control strategies for the Washington, DC-MD-VA region.

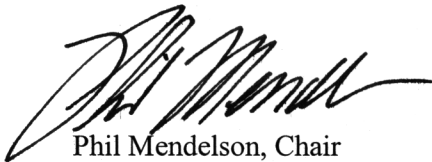
MWAQC supports the proposal to establish a new short-term hourly NO₂ standard and we urge EPA to establish such a standard based on sound science. The hourly standard is important to provide protection against short-term exposure to nitrogen dioxide. Research demonstrates there are health risks to asthmatics from short-term exposure. The proposed short term standard will limit peak concentrations and reduce the public health risk to respiratory systems.

MWAQC generally supports efforts to monitor roadside concentrations of NO₂, as these concentrations can be higher than average concentrations found at the community scale. The at-risk population affected by NO₂ concentrations near major roadways includes people who live, work or attend school near major roadways. We understand there are uncertainties and challenges related to implementing a roadside monitoring program. We urge EPA to undertake additional research to insure the efficacy of this program.

We are also concerned about the cost to establish and operate a roadside monitoring network, particularly in urban areas. We urge EPA to provide the resources necessary to state and local air monitoring agencies for establishing the NO₂ monitoring network. Without assistance, implementation of the requirement for a roadside monitoring network may not be feasible. This is a difficult economic time and states and localities are not in a position to take on new unfunded mandates.

Thank you for considering our concerns about the proposed NO₂ standard.

Sincerely,



Phil Mendelson, Chair
Metropolitan Washington Air Quality Committee