NESCAUM
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The Clean Air Association of the Northeast States
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Arthur N. Marin, Executive Director

February 3, 2006

Dr. Rogene Henderson
Attention: Mr. Fred Butterfield, Designated Federal Officer
EPA Science Advisory Board (1400A)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: NESCAUM statement on CASAC PM Review Panel to consider providing the Agency with additional advice and recommendations concerning EPA's proposed revisions to the PM National Ambient Air Quality Standards (NAAQS)

Dear Dr. Henderson:

NESCAUM appreciates the opportunity to provide a public statement relating to the February 3, 2006 public teleconference of the Clean Air Scientific Advisory Committee (CASAC) Particulate Matter (PM) Review Panel.

Our remarks make note of recently published (February 2006, *Journal of the Air & Waste Management Association*) technical materials relevant to understanding the behavior and protectiveness of alternative levels and forms of the $PM_{2.5}$ national ambient air quality standards (NAAQS).[1]

As shown in the accompanying figure, EPA's recently proposed 15/35 $\mu g/m^3$ annual/24-hour (98^{th} percentile) standard is nearly the least protective option that could have been selected among the recommended standard ranges offered by EPA staff and CASAC. Were EPA to pair the 35 $\mu g/m^3$ 24-hr standard with more stringent annual standards of 14 or 13 $\mu g/m^3$ (as recommended by CASAC) 23% or 46% more people would be protected by non-attainment designations as compared to the 15/35 $\mu g/m^3$ standard.

In the Northeast U.S., more stringent annual standards (14 or 13 $\mu g/m^3$) would result in 12% to 81% more protection, respectively. This finding raises an additional NESCAUM concern that a neither a 14 $\mu g/m^3$ nor a 35 $\mu g/m^3$ 24-hr

[1] Johnson PRS and Graham JJ. Analysis of Primary Fine Particle National Ambient Air Quality Standard Metrics. *Journal of the Air & Waste Management Association.* 2006:56(2).

standard provides the level of short- and long-term protection to northeastern populations relative to U.S. populations that more stringent standards would offer.

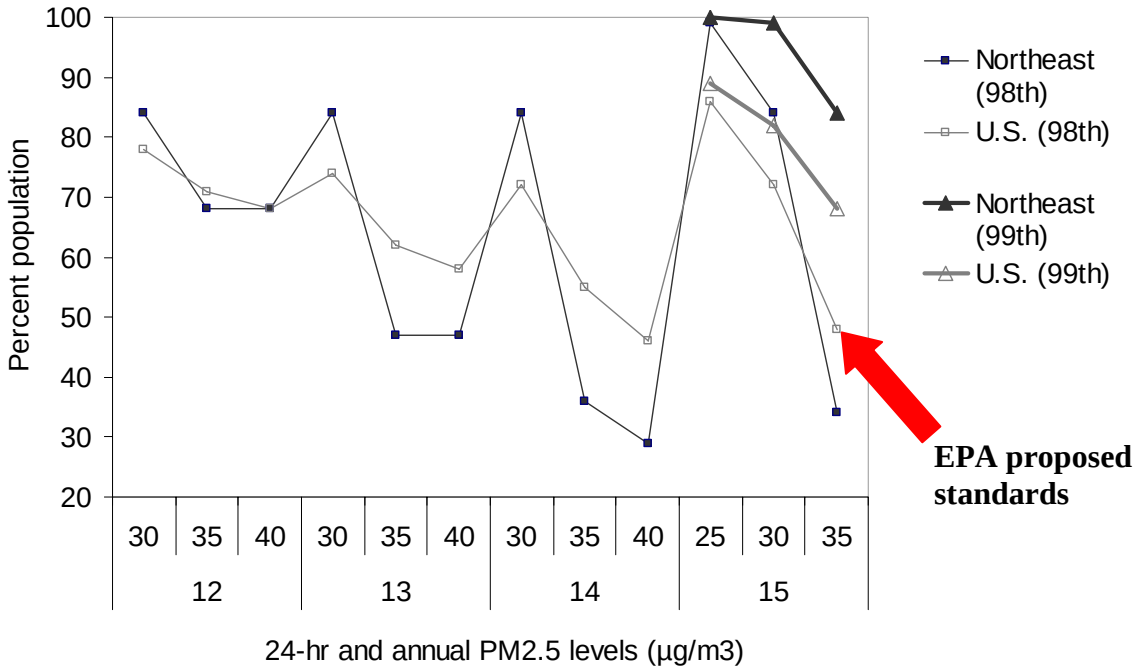
In conclusion, EPA has the option to more than double the number of people in the U.S. protected by $PM_{2.5}$ standards if it chooses to follow CASAC's recommendations for an annual standard of either 13 or 14 $\mu g/m^3$. This number could be considerably larger were the Administrator to propose even more stringent 24-hr and annual standards recommended by EPA staff. The Agency's current proposed standard combination only takes us part way toward truly effective standard setting.

Thank you for considering this statement.

Sincerely,

Philip Johnson, Senior Scientist
NESCAUM

cc: NESCAUM Directors, Air Toxics and Public Health Committee, Attainment Planning Committee



Estimated percent total population in New England, New Jersey, and New York counties (Northeast) vs. total U.S. county-level population that would benefit from compliance with alternative EPA staff and CASAC recommended 24-hr (98th and 99th percentile) and annual $PM_{2.5}$ standard ranges ($\mu g/m^3$) (2000-2002 FRM Regions 1, 2 for Northeast; 2001-2003 FRM country-wide for total U.S.) (Johnson and Graham 2006).