

New England  
Environmental  
Commissioners



*Gina McCarthy,  
Commissioner  
Connecticut Department of  
Environmental Protection*

*Dawn Gallagher,  
Commissioner  
Maine Department of  
Environmental Protection*

*Robert W. Gollidge, Jr.,  
Commissioner  
Massachusetts Department of  
Environmental Protection*

*Michael Nolin,  
Commissioner  
New Hampshire Department of  
Environmental Services*

*W. Michael Sullivan,  
Director  
Rhode Island Department  
Environmental Management*

October 27, 2005

Stephen L. Johnson, Administrator  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
**Mail Code:** 1101A  
Washington, DC 20460

Dear Administrator Johnson:

Fine particulate matter poses one of the greatest public health risks in our region and across the nation. The preponderance of health studies suggest that significant segments of the U.S. population are experiencing adverse health effects from exposures to ambient concentrations of fine particles (PM<sub>2.5</sub>), even at levels at or below the current national ambient air quality standard (NAAQS). The U.S. Environmental Protection Agency (EPA) has the opportunity to greatly reduce this risk by adopting an appropriately protective NAAQS for fine particles. We write to offer our thoughts and urge you to act decisively on this critical public health issue.

A large portion of the Northeast population is vulnerable to the health effects of airborne particulate matter at the concentrations currently measured on many days across the region. Sensitive populations include people with cardiovascular and respiratory conditions, diabetes, the young and elderly. Further, the population density of our region is among the highest in the nation, with over 30 million persons living in urban areas that typically experience the highest particulate matter levels. These areas have asthma rates that are among the highest in the nation and asthmatics are particularly sensitive to particulate matter.

Given the Clean Air Act's mandate to protect public health—including susceptible populations—with an adequate margin of safety, the Northeast states believe that epidemiologic and risk assessment evidence clearly supports more stringent PM<sub>2.5</sub> standards. While both EPA and the Clean Air Scientific Advisory Committee (CASAC) have concluded that a more health protective particulate matter standard is warranted, the broad range of levels and forms proposed in the EPA Staff Paper could result in adoption of a suite of standards that will not be adequately protective in our region.

Based on the weight of evidence of health effects findings and regional demographic and monitoring data, the Northeast states believe that a 24-hr PM<sub>2.5</sub> standard of 30 µg/m<sup>3</sup> (98<sup>th</sup> percentile form) and an annual PM<sub>2.5</sub> standard of 12 µg/m<sup>3</sup> are necessary to protect public health across the region. These levels are within the range offered in the EPA Staff Paper. A requirement to reduce current emissions of PM<sub>2.5</sub> and its precursors to meet a 12/30 µg/m<sup>3</sup> standard would result in 84 percent of the region's population directly benefiting from improved air quality, including about five times

more people in susceptible subgroups than at current standard levels. The attached paper describes an analysis that NESCAUM conducted in support of our efforts to reach regional consensus on the appropriate level of the new PM NAAQS. We strongly believe that a more protective PM NAAQS is appropriate and needed to address this important public health risk. Your pending decision relative to revising the NAAQS for particulate matter is of critical importance. We urge you to propose PM<sub>2.5</sub> standards in line with the lower end of the range recommended in the EPA Staff Paper.

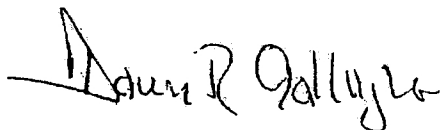
Sincerely,

**THE UNDERSIGNED ENVIRONMENTAL COMMISSIONERS**



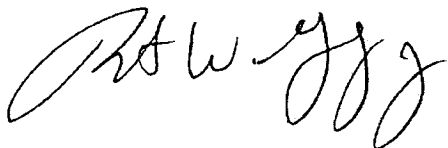
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Massachusetts Department of Environmental Protection*



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*Michael Nolin, Commissioner  
New Hampshire Department of Environmental Services*



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*W. Michael Sullivan, Director  
Rhode Island Department of Environmental Management*

CC: Robert W. Varney, Regional Administrator, EPA Region-1  
William Wehrum, Acting Assistant Administrator, Office of Air and Radiation  
Robert Brenner, Director, Office of Air and Radiation  
Steve Page, Director, Office of Air Quality Planning and Standards  
Lydia Wegman, Director, EPA OAQPS Air Quality Strategies and Standards Division  
John Bachmann, Associate Director, Office of Air Quality Planning and Standards  
Arthur Marin, Executive Director, NESCAUM