

Air Quality Index

NESCAUM commends EPA for soliciting comment on changes to the Air Quality Index (AQI) to reflect changes to the ozone NAAQS (72 FR 37882) at this point in time. Since the AQI is the major risk communication tool used to inform the public of potential and past exceedances of the NAAQS, it is critical that any updates to the AQI occur as expeditiously as possible.

NESCAUM recommends that the AQI yellow-to-orange breakpoint (AQI breakpoint of 101, "Unhealthy for Sensitive Groups") be set at a level to protect public health with an adequate margin of safety. EPA should therefore set this breakpoint, and the primary ozone NAAQS, consistent with the CASAC-recommended ozone NAAQS range, at a number between 0.060-0.070 ppm.

Furthermore, the AQI labeling, particularly for "Moderate," and "Unhealthy for Sensitive Groups" should be reexamined and modified to better reflect the fact that many people, including healthy adults and children, may be sensitive to ozone exposures. EPA currently indicates that, during "Moderate" AQI days, there may be a "moderate health concern for *a very small number of people*" (emphasis added) and during "Unhealthy for Sensitive Groups" AQI days, "people with lung disease are at greater risk from exposure to ozone...*[t]he general public is not likely to be affected when the AQI is in this range*" (emphasis added).

Moreover, the AQI should undergo a comprehensive review and overhaul, given that it is now dealing with multiple pollutants and is being used for different purposes than when it was initially established. EPA should also consider changing to a simpler AQI numbering scheme, such as is used with the UV-index³¹ (i.e., 0-15) or the Canadian AQHI scheme³² (i.e., 0-10+). Earlier this year, the NESCAUM states requested of EPA that it conduct an overhaul of the AQI (see Appendix C), and stand ready to work with the agency on this effort.

Potential Monitoring Network Changes

Moving to a primary ozone NAAQS of 0.070 ppm or lower may result in the need for additional sites to properly reflect non-urban population exposures. In addition, depending on the final NAAQS level, the ozone (and possibly the PAMS (photochemical assessment monitoring stations)) season may need to be extended. NESCAUM supports efforts that would better characterize public exposure to ozone, and urges that EPA be prepared to provide funding support for states to carry out such efforts.

³¹ See: <http://www.epa.gov/sunwise/uvindex.html>

³² See: <http://www.epa.gov/airnow//2007conference/tuesday/bruin.ppt>