

March 25, 2014

Dr. H. Christopher Frey, Chair
Clean Air Scientific Advisory Committee (CASAC)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

Re: Comments on the Ozone Policy Assessment Document for the National Ambient Air Quality Standards Review

Dear Dr. Frey and CASAC Members:

I am writing on behalf of the Northeast States for Coordinated Air Use Management (NESCAUM) regarding the Ozone Policy Assessment Document for the National Ambient Air Quality Standards (NAAQS) review. NESCAUM is the regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

In its March 30, 2011 letter to the U.S. Environmental Protection Agency (EPA), CASAC stated that: (1) the scientific evidence shows “no ‘threshold’ or level below which there is no risk of decrement in lung function following short-term exposure to ozone;” (2) it unanimously recommended that EPA select an 8-hour ozone NAAQS within the range of 60 to 70 ppb; and (3) it did not endorse EPA’s chosen primary ozone standard of 75 ppb as being sufficiently protective of public health. Moreover, the “CASAC Consensus Responses to Charge Questions” that was attached to the letter indicated that, “[g]iven the results of EPA’s exposure and risk assessments, setting a new NAAQS in the range of 60 to 70 ppb is appropriate, but would provide little margin of safety at its upper end.”¹ Studies released since that time have further substantiated the health impacts of ozone at the lower end of that range.

CASAC’s assistance in reviewing the scientific and health evidence is invaluable and its recommendations should be a key determinant in EPA’s selection of a NAAQS. CASAC’s tendency to recommend broad ranges, however, undermines the Committee’s impact. If CASAC believes the science supports a NAAQS set at the lower end of the range, it is incumbent upon this body to specify a health-protective value or narrow its recommended range. For purposes of the Ozone Policy Assessment Document, CASAC should recommend to EPA a specific number or a narrower range for the 8-hour ozone NAAQS that provides an adequate margin of safety to protect public health, consistent with the requirements of the Clean Air Act.

¹See: [http://yosemite.epa.gov/sab/sabproduct.nsf/F08BEB48C1139E2A8525785E006909AC/\\$File/EPA-CASAC-11-004-unsigned+.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/F08BEB48C1139E2A8525785E006909AC/$File/EPA-CASAC-11-004-unsigned+.pdf)

Thank you for the opportunity to comment. Do not hesitate to contact me at 617-259-2017 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arthur N. Marin". The signature is written in dark ink on a white background.

Arthur N. Marin
Executive Director

C: NESCAUM Directors
Dr. Holly Stallworth, U.S. EPA