The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

March 17, 2015

RE: DOCKET ID No. EPA-HQ-OAR-2008-0699, National Ambient Air Quality Standards for Ozone

Dear Administrator McCarthy:

On behalf of Union of Concerned Scientist’s 450,000 members and supporters, I am writing to request that the Environmental Protection Agency (EPA) respects the best available science and Clean Air Scientific Advisory Committee (CASAC) recommendations and strengthens the current ozone standard to a level that provides an adequate safety margin for the most vulnerable populations, including asthmatics, children, and the elderly. This would require setting the standard between 60 and 70 ppb, recognizing that a standard closer to 60 ppb provides greater health benefits.

The Agency has the simple yet profound charge to protect human health and the environment. In order to carry out this mission effectively the EPA must make science-based policy decisions that protect the public with an adequate margin of safety.

The Agency determined that ozone is a pollutant that endangers public health and welfare. The Clean Air Act mandates that the standard is set based solely on the best available science to determine what level is protective of public health with an adequate margin of safety that protects the most sensitive populations. The Clean Air Act unambiguously bars the consideration of costs when setting National Ambient Air Quality Standards (NAAQS). This provision of the law was upheld in Whitman v. American Trucking Ass’ns, Inc., 531 U.S. 457 (2001).

The science on what standard protects public health is clear. The CASAC Ozone Review Panel found that the current NAAQS for ozone endangers human health. The panel concluded that at concentrations of ozone meeting the current standard, there is still a causal relationship between short-term ozone exposure and a broad range of respiratory effects, including respiratory symptoms, inflammation, hospital admissions, and emergency department visits. This builds on the findings of previous CASAC Ozone Review Panels, which have repeatedly concluded, in 2011 and 2014, that there is strong scientific evidence for a standard between 60 and 70 ppb, with further evidence suggesting that a 70 ppb standard may not protect public health with an adequate margin of safety.
The Union of Concerned Scientists applauds the EPA’s decision to strengthen the ozone standard. UCS encourages the agency to set a standard that follows the recommendation of the science advisory committee, provides an adequate margin of safety to vulnerable populations, and protects Americans from preventable asthma attacks, heart attacks, and premature deaths.

Respectfully submitted,

By: Gretchen Goldman, Ph.D.

Lead Analyst
Union of Concerned Scientists
1825 K Street NW, Suite 800
Washington, DC 20006
www.ucsusa.org