

**Testimony on EPA's Proposed Rulemaking for
"National Ambient Air Quality Standards for Ozone"
Docket Number EPA-HQ-OAR-2008-0699**

Elena Craft, PhD

Environmental Defense Fund

January 29, 2015 Public Hearing
Arlington, TX

My name is Elena Craft and I am a toxicologist/health scientist with Environmental Defense Fund. I also have an adjunct appointment at the UT Health Science Center in Houston. Thank you for the opportunity to testify today.

EDF commends EPA and Administrator McCarthy for proposing the National Ambient Air Quality Standard for ozone. We respectfully request that EPA follow the recommendation of the Clean Air Scientific Advisory Committee (CASAC) and reduce the National Ambient Air Quality Standard for Ozone to protect public health, children, and sensitive populations. We urge EPA to set the standard for ozone at 60 parts per billion (ppb) as the scientific record demonstrates that this level would provide the strongest public health protections for Americans.

The Science is Clear and Compels EPA to Update the Standards

As EPA is well-aware, exposure to ozone can harm the respiratory system, aggravate asthma and other lung diseases, and is linked to early death from respiratory and cardiovascular causes. People with asthma, children, and older adults are among the populations most at risk from breathing air containing ozone. The independent CASAC has indicated the current standard is inadequate to protect public health and recommended a range of 60 to 70 ppb. Furthermore, CASAC emphasized that "[a]t 70 ppb, there is substantial scientific evidence of adverse effects...including decrease in lung function, increase in respiratory symptoms, and increase in airway inflammation." CASAC was clear that a standard of 60 ppb would offer more public health protection than a standard of 65 or 70.

EPA's analysis is based on an extensive and compelling body of scientific evidence. Since the last proposal, there have been more than 1,000 new studies that demonstrate the health and environmental harms of ozone. EPA's analysis highlights the clear, profound health benefits of strengthening the ozone standard to 60 ppb. Indeed, EPA estimates at this level of protection the monetized benefits in 2025 will be \$37–75 billion.

We can get there

Critics will say that we can't meet more health protective standards – that we'll have to stop using drive-thrus and having BBQs. But if we look past the fear mongering, we see that in Houston, for example, one of the most polluted cities in the country for ozone, ozone is actually on the decline and data indicate that the proposed standards are achievable. In a 2013 peer reviewed report from Environmental Science and Technology that examined ozone transport in the Houston Galveston area, regional background ozone demonstrated a decline of ½ to ¾ ppb per year in Houston, corresponding to a decrease of 7-11 ppb ozone between the years 1998 and 2012¹. Houston experienced the fewest number of ozone exceedance days ever this past year – 14 exceedance days – down from 65 in 2006². These reductions reflect a national decline in ozone attributable in part to implementation of national clean air act protections. Forthcoming protections include the cross state air pollution rule and the Tier 3 clean car standards, both of which will contribute to significant and sustained emissions reductions.

With regard to the cross state air pollution rule specifically, new information from EPA outlined in a January 2015 memo from Stephen Page to regional air division directors indicates that Houston stands to gain several ppb worth of ozone reductions by 2018 as a result from controls implemented in upwind states like Louisiana and Mississippi³.

And EPA's own data (for all states excluding California) also indicates that much of the country will be able to meet the proposed standards by 2025 – almost 90% of counties projected to be out

¹ Berlin et al. (2013) Magnitude, Decadal Changes, and Impact of Regional Background Ozone Transported into the Greater Houston, Texas, Area. *Environmental Science and Technology* 47(13985-13992).

² http://www.h-gac.com/taq/airquality/raqpac/documents/2015/Jan%2015/NovDec2014_AirQualityData.pdf

³ Memo from Stephen Page to Regional Air Division Directors, Regions 1-10. *Information on the Interstate Transport "Good Neighbor" Provision for the 2008 Ozone National Ambient Air Quality Standards (NAAQS) under Clean Air Act (CAA) Section 110(a)(2)(D)(i)(I)* January 22, 2015.

of attainment with a standard of 65ppb – and close to 100% of the counties projected to be out of attainment with a standard of 70ppb⁴.

Economic Progress and Clean Air Standards

For four-and-a-half decades of implementing the Clean Air Act, the US has maintained strong economic growth. As the energy capital of the country, Texas has proven time-and-time again that it has the ingenuity to innovate and thrive economically without sacrificing one of our most precious resources, clean air.

Conclusion

As a scientist, and as a mom of an 8 month old baby boy Luke, I applaud EPA's efforts in protecting public health. How exciting is it that in our lifetimes we are witnessing incredible progress in securing clean air across the nation? We appreciate EPA's support and thank you for your leadership. Setting the ozone standard to 60 ppb will help those of us in Texas and across the country breathe easier.

Thank you for the opportunity to testify.

⁴ <http://www.epa.gov/glo/maps.html>