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**Subject: Comments to the U.S. Environmental Protection Agency (EPA) Clean Air Scientific Advisory Committee (CASAC) on the Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards (NAAQS), Second External Review Draft**

Dear Chairman Frey and CASAC Panel Members,

The purpose of reviewing the 2008 National Ambient Air Quality Standards (NAAQS) for ozone, according to the Environmental Protection Agency (EPA), is “to ensure they are scientifically sound and protective of public health and the environment.” To achieve this, the Clean Air Scientific Advisory Committee (CASAC) is tasked with providing independent advice to the EPA Administrator on the technical bases for EPA’s national ambient air quality standards (NAAQS) to either maintain air quality standards and/or prevent significant deterioration of air quality. It is with this meshing of scientific review and anticipated public policy in mind that I wish to offer comments on EPA’s Draft Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards that advocates for CASAC to consider recommending to the Administrator an ozone level in the 70ppb- 60ppb range.

The stated goal of the ozone NAAQS is in part to improve public health. This is a commendable objective and one shared by the **State of South Carolina**. However, CASAC must be cognizant of the impact more stringent ozone standards would have on local economies and how those affects impend health on a social, economic, and ecological level. **A revision of the current Ozone standard to one within the 70 ppb – 60 ppb range could potentially alter the attainment status within South Carolina. A change in attainment status, due to a tightening of a NAAQS could have a significant impact on the employment, wealth and quality of life for the residents. There is usually an increase in cost, time, and resources for facilities to make modifications in areas that are designated non-attainment. Non-attainment permitting often results in offsets to compensate for the additional requirements that include fewer job opportunities and a decrease in industrial growth.**

When considering ozone standards, and any possible changes, it is important to note the EPA’s own reports have indicated an overall decline in ozone pollution. Specifically, there has been a decline in the overall concentration level of criteria pollutants for ozone of 25 percent in the past 20 years. This progress has occurred prior to and as we await the full implementation of the existing ozone NAAQS level of 75ppb. Furthermore, this continuing improvement indicates the current standard is working and there is no need for any modification.

EPA’s Draft Policy Assessment does not take into account the reductions in ozone levels as a direct result of existing regulations and those yet to take effect. Dramatic improvements in ozone levels will continue to come from the 75ppb standard that was enacted in 2008. A recommended revision to the ozone NAAQS standard by CASAC to EPA would greatly increase the stringency of the ozone regulation at a time when implementation of existing standards is already resulting in noticeable progress and would only undermine the efforts of counties and states focused on addressing existing ozone standards. Counties and states need some predictability in order to develop long range plans to achieve ozone reduction. Pushing the goal post back disallows state and local entities the time and flexibility needed to implement already existing ozone standards. Changing the standard does not help counties meet existing ozone standards, but forces them to take two steps back as they fall further out of compliance with federal Clean Air Act requirements.

In conclusion, I urge CASAC to take notice of the current progress that has been and will be made in cutting the overall levels of ozone before recommending public policy to the EPA Administrator that will result in further harmful regulation that would run the risk of diluting current compliance efforts. I remain committed to helping to achieve a cleaner environment through the continuation of proven technological and regulatory efforts, but to do this the current standard of 75ppb should be allowed to further reduce ozone.

For these reasons, I strongly urge that any recommendation to EPA to tighten the ozone standard should at minimum include the 75ppb standard within the range of consideration.

Sincerely,

/s/

Kisha R. Hines

c: T.N. Effinger / D. Shier / E-file