



March 13, 2014

Dr. Holly Stallworth
EPA Science Advisory Board Staff Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Pennsylvania Chamber of Business and Industry 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,

On behalf of the Pennsylvania Chamber of Business and Industry (PA Chamber), the largest, broad-based business advocacy association in the Commonwealth representing thousands of members that cross every industry sector, I am writing to express our significant concern regarding the Clean Air Scientific Advisory Committee's (CASAC) Draft Policy Assessment for the Review of National Ambient Air Quality Standards.

Despite the fact that air quality has improved greatly in recent years, the CASAC is proposing to recommend to EPA Administrator Gina McCarthy that the national ambient air quality standard for ozone be revised more stringently to 60 to 70 parts per billion (ppb). Such a revision would potentially damage the business climate in Pennsylvania for nearly every single industrial sector, from mining to manufacturing to refining to agriculture, at a time when the national economy continues to face significant headwinds. Given this, CASAC should, at minimum, keep the current ozone standard of 75 ppb in its recommended range.

Businesses in Pennsylvania have taken great strides to make significant and documented progress in reducing air quality emissions in the state, particularly ozone precursors such as NO_x, CO and volatile organic compounds. The state Department of Environmental Protection (DEP) reports to EPA an emissions inventory every three years. The inventory includes data on emissions from point sources. According to the data included in the most recently submitted inventory, between 2008 and 2011 alone, emissions of NO_x fell by 18.35 percent, VOCs by 17.5 percent and CO by 8.9 percent. These significant reductions resulted in a noted improvement in air quality for Pennsylvanians.

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DEP uses air quality monitoring and modeling to forecast air quality on daily basis. Alerts are issued for various regions of the state on days when air quality is poor based on ozone and particulate matter concentration. In 2010, DEP issued air quality alerts for ozone concentrations in one or more forecasting areas on 28 days. In 2013, DEP issued air quality alerts for ozone concentrations in one or more forecasting areas on just 11 days. This is notable both for the significantly fewer number of issued alerts and that the DEP began forecasting in eight additional areas in 2012.

The stated purpose of reviewing the 2008 NAAQS for ozone, according to the EPA, is “to ensure they are scientifically sound and protective of public health and the environment.” This is a worthy objective and the pursuit of it must be balanced with a consideration of how a stricter ozone standard would impact the public’s social and economic health. The EPA has noted an overall decline in ozone pollution, consistent with the DEP data and forecasting. It is clear that the existing standard of 75 ppb is having a positive effect on air quality. Further downward revisions of the standard are unnecessary and could have a significant impact on the employment, wealth and quality of life for Pennsylvanians.

That is why it is troubling that the EPA’s Draft Policy Assessment does not take into account the already achieved reductions in ozone levels as a direct result of existing regulations. Numerous regulatory initiatives underway in Pennsylvania and by the EPA, as well as best practices by industry, are projected to result in further reductions or control of emissions, particularly ozone precursors.

The PA Chamber and its members are also troubled by the underlying science supporting the Draft Policy Assessment. We are concerned a standard in the 60 to 70 ppb range would be technically unachievable by industry and impossible for state and local governments to implement. It is clear ozone pollution is decreasing, and Pennsylvania and other states are just beginning to implement their plans. We maintain it is imperative for both the business community and government in Pennsylvania to have consistency and certainty when it comes to regulation.

For these reasons, the PA Chamber urges that any recommendation by CASAC to the EPA regarding the ozone standard include 75 ppb within the range of consideration.

Sincerely,

/s/

Gene Barr
President and CEO
Pennsylvania Chamber of Business and Industry