

Oral Testimony Before the CASAC Ozone Review Panel on the Second External Review Draft of the Policy Assessment for the Review of the Ozone National Ambient Air Quality Standard

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Thank you for the opportunity to speak on behalf of the Utility Air Regulatory Group (UARG). My comments will focus on two key issues with the cumulative secondary O₃ standard considered in the current draft of the Policy Assessment (PA; US EPA, 2014b): (1) the redundancy of the cumulative standard; and (2) the limitations associated with implementing a cumulative standard. Overall, EPA has not demonstrated that adopting this new standard provides any greater welfare protection than what is provided by the current primary standard.

First, a cumulative seasonal standard set at a W126 level of 15 ppm-hrs is redundant when compared to the current standard of 75 ppb. The air quality modeling conducted by EPA demonstrates that, by just meeting the existing primary standard of 75 ppb, estimated cumulative concentrations are already within the range recommended by EPA (which is 7-15 ppm-hrs or somewhat higher). For example, when just meeting the current standard, nearly all model-adjusted monitors are at or below an estimated cumulative value of 15 ppm-hrs and the 5 monitors estimated to exceed 15 ppm-hrs are limited to areas where estimates are uncertain due to low monitoring site density and high US background contributions. In fact, EPA concludes in the PA that there is a fairly strong, positive degree of correlation between the existing standard and the alternate cumulative standard (US EPA, 2014b). As shown on this figure (*see slide*), modeled concentrations are nearly identical when just meeting the existing standard or an alternative cumulative standard of 15 ppm-hrs. In other words, the current standard is an effective surrogate of the cumulative form proposed by EPA. Therefore, there is no need to implement the cumulative secondary standard when the level is set at 15 ppm-hrs. Further, as I already presented to you in my comments on the Welfare Risk and Exposure Assessment (US EPA, 2014a) yesterday, EPA identified substantial but uncertain reductions in welfare risks when moving from recent conditions to just meeting the existing standard of 75 ppb or a cumulative standard level of 15 ppm-hrs. Only marginal and increasingly uncertain additional welfare risk reductions were estimated at 11 and 7 ppm-hrs. Therefore, it cannot be

reasonably concluded that a more stringent alternative cumulative standard below 15 ppm-hrs will provide meaningful additional welfare protection.

Second, although EPA states in the PA that it can consider programmatic stability in determining the form of the NAAQS, it has provided limited discussion regarding this issue as it relates to a cumulative form of the secondary standard. Since the existing monitoring network has been developed over decades to meet the current form of the O₃ standard, there are likely to be substantial challenges associated with adopting a new cumulative form. For example:

- EPA has not discussed whether the current monitoring network provides sufficient information to appropriately measure and implement a cumulative, seasonal standard;
- EPA has also not established a time-frame for developing or refining the current monitoring and reporting system to meet the requirements of a cumulative standard; and
- EPA also provides no discussion on what tools are needed to properly maintain and communicate cumulative standard data, such as additional monitoring stations or equipment, and/or preferred statistical or analytical procedures to summarize O₃ concentrations.

Thus, EPA has not demonstrated that adoption of a new form of the secondary standard is practicable or what requirements are necessary to successfully implement it.

In conclusion, EPA has demonstrated that just meeting the primary standard would result in a substantial reduction of O₃ concentrations and welfare risks consistent with implementing a cumulative standard at a level of 15 ppm-hrs. Further, there is too much uncertainty to reasonably conclude that a level of the cumulative standard below 15 ppm-hrs will provide meaningful additional welfare protection. Finally, there are likely significant programmatic challenges with adopting a new form of the secondary standard. Consequently, CASAC and EPA should recommend no change to the current secondary standard.

On behalf of the UARG, thank you for your consideration of these comments.

References

US EPA. 2014a. "Welfare Risk and Exposure Assessment for Ozone (second External Review Draft)." EPA-452/P-14-003a. 305 p., February.

US EPA. 2014b. "Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards (Second External Review Draft)." EPA-452/P-14-002. 510p., January.