



January 17, 2012

To: Members of CASAC

Subject: BP America comments on the ‘Second External Review Draft Integrated Science Assessment for Ozone and Related Photochemical Oxidants’ (EPA/600/R-10/076B)’

Dear Members of CASAC:

Please find comments from BP America on the second draft ozone ISA on the federal register [by following this link](#). You can access the full text of our comments from the ‘view pdf’ tab under ‘Comments’.

BP’s comments are focused on Chapter 3 of the ISA, in particular to background ozone concentrations and monitoring. We believe that several significant issues related to background ozone concentrations need to be addressed prior to considering changes to the ozone NAAQS including the following:

1. EPA should recognize that there remain significant uncertainties in predicting background ozone concentrations.
2. It is imperative that a more sophisticated definition of background ozone be adopted for health and exposure assessments. EPA should not assume that emissions within Canada, Mexico or any other country are controllable by US policies because there is no ratified treaty that gives the United States this authority.
3. EPA should recognize and disclose that the importance of background in their exposure and risk calculations increases as the proposed standard decreases.
4. EPA should consistently acknowledge that background ozone does not decrease with increasing ozone, and that background ozone is generally positively correlated with total ozone up to ~70 ppb MDA8.
5. EPA should use modeled background that is paired in time and space with observations.
6. EPA should disclose the relationship it assumes between MDA8 and 1-hour exposure.
7. EPA should update QA/QC protocols and surface ozone monitoring network instruments to measure ozone with improved precision and accuracy necessary to meet any standard. Adding co-located additional pollutant (e.g., CO, PM) and aerosol measurements at monitoring sites would add tremendous value to the observational record.

8. For discussions regarding attainment, background should be defined in a statistical form that is consistent with the standard.
9. The current regulatory framework available for compliance does not allow for exclusion of high background events.
10. It is currently not possible to deal with background or exclusion of non-controllable high events in implementation.

These comments were prepared by Nicole Downey, Ph.D. (Earth System Sciences, LLC), Doug Blewitt, CCM (AQRM), and Dana Wood, PE (BP).

Thank you for your consideration of BP America's comments. If you need any further information, you can contact Dana Wood at dana.wood@bp.com (281-366-3489).

Sincerely,

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