



**Associated  
Industries  
of Missouri**

*The Voice of Missouri Business.*

**3234 West Truman Blvd.  
Jefferson City, MO 65109  
(573) 634-2246  
Fax: (573) 634-4406  
www.aimo.com**

March 3, 2014

**Subject: Comments to CASAC on the Ozone NAAQS Policy Assessment**

Dear Chairman Frey and CASAC Panel Members:

I am writing regarding my members' concerns over the Environmental Protection Agency's (EPA) reconsideration of the 2008 National Ambient Air Quality Standard (NAAQS) for ozone in the range of 60 parts per billion (ppb) to 70 ppb. We at Associated Industries of Missouri consider the lowering of NAAQS a threat to Missouri's economic well-being and a hardship for many of Missouri's leading manufacturing companies.

The proposed lowering of NAAQS will impact businesses in Missouri, from small auto repair shops to large manufacturers. In Missouri, our domestic automobile manufacturers are rebounding and this proposal will undoubtedly create a hurdle for new plants and expansions. This unreasonable regulation will also impact the food, beverage and tobacco product manufacturing industries, chemical manufacturing, fabricated metal product industries, and machinery manufacturing, just to name a few.

EPA is using questionable to justify moving to this lower standard. For example, studies that linked higher ozone levels to respiratory problems did not take into account factors such as smoking that could impact health. Last year, a federal court upheld EPA's decision that the current standard of 75 ppb protects human health with a margin of safety. If that is true, why would the EPA want to lower the standard below 75 ppb?

Not only is the science questionable, reduction of the standard would unnecessarily cause severe economic impacts to our community and state. When the EPA considered tightening the same standard in 2010, the estimated costs in Missouri were \$1.9 billion per year.

We cannot afford to add to the economic pain of people who are already at risk of losing their health care and other employment benefits for their families. Furthermore, we cannot put our communities at risk of losing local tax revenue to fund schools, police and fire departments, and other essential services.

Given the severe economic impact this unreasonable standard could cause, and the inconclusive health benefits of a lower standard, I respectfully request that CASAC recommend an ozone range that

Associated Industries of Missouri  
Comments to CASAC on Ozone NAAQS Policy Assessment  
March 3, 2014  
Page Two

includes 75ppb within the range of a new standard. I believe this approach would better serve the interests of the public and support our nation's continued economic recovery.

Sincerely,

Ray McCarty  
President/CEO  
Associated Industries of Missouri