



Greater Yellowstone Coalition

People protecting the lands, waters, and wildlife of the Greater Yellowstone Ecosystem, now and for future generations.

U.S. Environmental Protection Agency
Clean Air Scientific Advisory Committee
Ozone Review Panel for the Reconsideration of the 2008 NAAQS
1300 Pennsylvania Ave., N.W.
Washington, D.C. 20004

February 7, 2011

Re: Comments for Consideration at the CASAC Teleconferences, February 18 and March 3, 2011

Dear Members of the CASAC:

Please accept these comments from the Greater Yellowstone Coalition for your reconsideration of the 2008 National Ambient Air Quality Standard (NAAQS) for ozone.

CASAC has unanimously supported establishment of a primary NAAQS for ozone in the range of 0.060 to 0.070 parts per million (ppm) over an eight-hour averaging period. CASAC has also supported establishment of a unique secondary NAAQS for ozone that is cumulative and extends over the entire growing season. CASAC has conveyed these views to the EPA Administrator in letters dated October 24, 2006, March 26, 2007, April 7, 2008 and February 19, 2010.

Given that CASAC has not wavered in its consistent position to establish ozone NAAQS in the above ranges, we urge CASAC to continue to recommend to the Administrator to promulgate the final rule establishing a new ozone NAAQS. The science has been strong that the right course is CASAC's support for a primary NAAQS in the 0.060 to 0.070 ppm range and a secondary standard based on the W126 form within the range of 7 to 15 ppm-hours. It is appropriate that the CASAC recommend a range from which the Administrator is to select the appropriate level of a NAAQS that protects public health and welfare.

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We remind you of our signed letter of March 5, 2010, submitted on our behalf by Bruce Pendery of the Wyoming Outdoor Council. This letter describing our comments on this rulemaking should be readily available to the CASAC as: Docket No. EPA-HQ-OAR-2005-0172. Exhibit 1 submitted with these comments was a well-reasoned petition for rulemaking filed by several Wyoming citizens asking the Wyoming Environmental Quality Council to set a State primary ozone standard at 0.065 ppm. Much of the analysis and support for the petition is based on EPA documentation of which the CASAC was involved in developing and, thus, is familiar with.

Thank you for your consideration of these comments.

Sincerely,

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