



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
THE ADMINISTRATOR

August 31, 1992

EPA-SAB-CASAC-COM-92-009

Honorable William K. Reilly  
Administrator  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Dear Mr. Reilly:

The members of the Clean Air Scientific Advisory Committee (CASAC) have noted with interest the announcement that the Agency is not revising the national air quality standard for ground-level ozone at this time and is initiating a new assessment of the health and environmental effects of ozone. The purpose of this letter is to indicate the willingness of the CASAC to assist the Agency in carrying out a review of the new assessment in an expeditious manner. To facilitate CASAC involvement, it would be useful for the Committee to be briefed at an early date on the Agency's plans for development of the new criteria document on the health and environmental effects of ozone and the subsequent development of a staff position paper on the ozone standard(s).

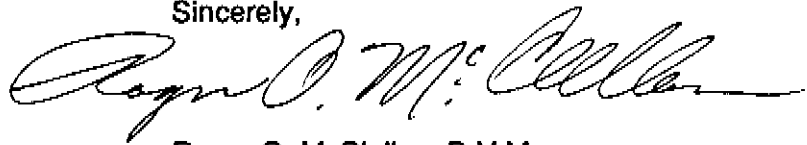
A briefing for CASAC would provide the opportunity for both CASAC and other interested persons to comment on the Agency's plan for carrying out the important task of preparing new documents. With this as background, CASAC can plan its associated review of the criteria document and staff position paper in a timely manner. The briefing would also provide an opportunity for the Agency and other scientists to describe the state of research now in progress on ozone that will potentially be completed and subjected to peer-review in time for its inclusion in a new assessment. This is especially important since research on ozone is, and should be, ongoing because of the importance of ozone as a pollutant. Nonetheless, it is crucial that at a particular point in time, that is understood by all parties, the knowledge base on ozone be summarized and used for regulatory purposes. A side benefit of the summarization process is that it can also serve to identify information needs which in turn provides input for establishing the research agenda for the future.

The CASAC members are of the opinion that a carefully planned strategy for preparation of the criteria document and staff position paper is essential in view of the magnitude and complexity of the task. As you and your staff are aware, substantial new information has been published since the last criteria document and supplement and staff position paper were prepared. Other studies which may yield significant new information

include the National Toxicology Program chronic bioassay with rodents exposed to ozone and new human exposure assessment models are nearing completion. The review, integration and interpretation of the old and new information will be a substantial undertaking. In addition, it will be imperative that the next staff position paper carefully consider alternative forms of the ozone standard, both in terms of averaging times, such as daily (6-24 hour), as well as frequency of occurrence, and seasonal standards, in addition to the traditional one hour standard. This, too, will require substantial preparation effort and, I suspect, ample time for debate.

The CASAC is anxious to assist in these important activities and looks forward to hearing from you as to when the Agency will be ready to brief CASAC on the proposed plans for preparation and review of the ozone criteria document and staff paper.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger O. McClellan".

Roger O. McClellan, D.V.M.  
Chairman, Clean Air  
Scientific Advisory Committee

ROM:eam