

Oral comments on OZONE Standards, the Ozone ISA and the Ozone PA for 2019

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1. The EPA ozone science does not justify continued aggressive ozone regulation and it is time to stand down on ozone regulations.
2. The weak exercise/ozone inhalation studies cited by the EPA would not be admissible in a Federal Court because it violates basic toxicology scientific rules.
3. There is no EPA research that shows any benefits from the air quality changes by all the EPA regulations of the past 20 years. Is it evidence that the air pollution wars of the past 20 years were against a PHANTOM MENACE? Ozone is a classic example of a menace that was not.
4. Ten years ago the EPA Clean Air Scientific Advisory Committee advised the EPA that ozone could not be shown to produce adverse health effects at the standard then, 0.12 PPM. Even then the CASAC, which is inclined to favor EPA policy proposals as a creature of the agency, was reluctant to support the ozone standard reduction from 0.120 ppm to a lower number. Chairman George Wolff said “although the panel member’s opinions differed, none supported the lower end of EPA staff’s recommendations, and a majority of members stated a position which included . . . the present standard.”
5. Ozone is not allergen—it cannot cause asthma—period, scaring people about asthma is irresponsible when the cause of asthma is organic allergens, not man made inorganic emissions.

DISCUSSION

The EPA cited health effects studies are weak on adverse ozone health effects and weak generally on air pollution adverse effects.

Even heavy exercise with ozone inspired above current limits shows little ozone effect and no disease. The effect shown was mostly subjective respiratory mechanical effect. Ozone makes air heavy and increases its suspended/solute load.

Expanding the effect of the EPA with “susceptibility.”

The EPA also misuses the concept of sensitive or susceptible groups to make any exposure a concern for regulation. Susceptibility allows the EPA extraordinary latitude and there is always a “susceptible” group that requires an extra margin of regulatory “safety.”

The EPA is no longer in the business of protecting the public health and preserving the environment, the new range of ozone standards is an example of what the EPA wants the world to be--a scrubbed down bubble with no dust and no ozone for its own purposes, with a significantly smaller human population.

Generally even a blind toxicologist can prove a toxic effect by showing that the removal of a toxin caused a benefit. If there are air quality improvements like a decline in ozone then there should be a corresponding improvement in the health of the public.

Los Angeles and Houston air have improved—why no research to show the benefits? Is the EPA a one trick pony—they can only talk panic and crisis and bad air? Good air, safe air is not in the lexicon, only bad air and assertions of people dying from bad air? The proof of benefit would be the logical scientific inquiry to show the value of EPA activity and tighter air standards. Where are those studies of benefit?

Conclusion and recommendation.

There is no health effects science that justifies the current ozone standard so I advocate a roll back of the standard,. Ozone should go the way of large particles, no longer on the list of EPA targets.

Imagine a government control program that has an end.

Economic and political effects of adoption of the recommendation.

I project that billions of taxpayer dollars and compliance costs could be returned to the citizens as soon as the EPA gives up chasing ozone, a benign component of the natural world.

I also project that a chastened and re-dedicated EPA might, after the end of the ozone campaign, eschew future goose chases, and focus on serious, non-political, scientific inquiries in the public interest.