

## Stallworth, Holly

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**From:** sdfarren@gmail.com on behalf of Steve Ferren <steve@aoma.org>  
**Sent:** Wednesday, March 12, 2014 5:46 PM  
**To:** Stallworth, Holly  
**Subject:** Ozone-NAAQS Review

Dear Dr. Stallworth,

Air quality has improved dramatically over the last decades. We can build on this progress without going to the stricter and potentially very damaging Ozone NAAQS standards EPA may soon be proposing.

Therefore, we are writing to urge CASAC to finish its review and include the retention of the existing standards in the proposal. We believe that a fair analysis of the record will show retaining the existing standards of 75 parts per billion is the right policy choice. Strict new standards are not justified from a health perspective and are not needed to continue air quality progress.

We can all agree that sensible government regulations contribute to the protection of safety and health without impeding energy development, job creation, and economic growth. And we all want a clean and healthy environment for ourselves, our neighbors and our families. However, further tightening the 2008 ozone standards – the most stringent ozone standards ever – is a major concern because of the potential cost, reach and impact on the economy, and the lack of air quality benefits.

Tightened standards could impose unachievable emission reduction requirements on virtually every part of the nation, including rural and undeveloped areas. The challenges of meeting potential strict new standards would be massive. In many places, they would require ozone levels to be forced down to or below peak background levels. That's because ozone is created naturally. It is present and can be detected at significant levels everywhere, including the nation's parks and wilderness areas.

With potential strict standards that approach or are even lower than naturally occurring levels, virtually any human activity that produced emissions could ultimately be restricted or affected. In some cases, new development simply would not be feasible or permitted.

The US is making progress toward meeting the current standards and air quality will continue to improve as we continue to reduce emissions that form ozone. EPA and the states are just beginning to develop the plans to meet the previous 2008 ozone standards, so EPA should not be changing the standards now before those efforts can be fully undertaken.

For these reasons, we urge that any recommendation to EPA to tighten the ozone standard to include the current 75 ppb standard within the range of consideration.

Kind regards,

/s/

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