



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

April 1, 2020

THE ADMINISTRATOR

Louis Anthony Cox, Jr., Ph.D.
Chair, Clean Air Scientific Advisory Committee
Science Advisory Board
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington D.C. 20460

Dear Dr. Cox:

Thank you and the members of the Clean Air Scientific Advisory Committee for your comments on *EPA's Integrated Science Assessment for Ozone and Related Photochemical Oxidants (External Review Draft – September 2019)*, hereafter referred to as the draft Ozone ISA. My staff and I appreciate the thorough and constructive comments provided by the CASAC during its public meeting on December 4-6, 2019, public teleconference on February 11, 2020, and in your letter dated February 19, 2020, which contained the CASAC's consensus responses to the agency's charge questions and individual review comments from its members.

My staff and I are carefully considering your comments and recommendations, as well as the comments we received from the public. I would like to provide you with an update on our progress responding to those comments and recommendations as well as our path forward. As you know, CASAC's advice plays a critical role in the process of evaluating the science underpinning our National Ambient Air Quality Standards under the *Clean Air Act*, including whether existing standards are requisite to protect the public health with an adequate margin of safety as well as other statutory questions.

The CASAC has raised a number of important issues with the draft Ozone ISA. In addition to offering numerous consensus and individual comments on scientific issues, the CASAC has requested that the agency incorporate substantial changes to our documentation procedures. As you noted in your letter, the CASAC finds that the draft Ozone ISA "does not provide a comprehensive, systematic assessment of the available science relevant to understanding the public health impacts of changes in ambient concentrations of ozone." Some of these comments and adjustments can be addressed in the near term, while others will require additional time to complete.

The process outlined in the EPA's May 9, 2018, "Back-to-Basics" memo directs the agency to ensure that NAAQS reviews are completed in a timely, efficient and transparent

manner, consistent with the *Clean Air Act*. The five-year review cycle for each NAAQS is challenging in light of the continuous development of new and relevant science, challenges compounded by the EPA practice of facilitating CASAC and public engagement throughout the process. With this in mind, I have directed my staff to do the following:

- Complete the review of the Ozone NAAQS by the end of 2020. The difficulty of this task is not lost on me, and I recognize that the CASAC has raised concerns regarding the limitations of the current draft Ozone ISA. I have asked that staff maintain their focus on meeting our statutory deadlines while reflecting the latest scientific information in final Ozone ISA. In practical terms, this means:
 - By April 2020, incorporate the CASAC's comments and recommendations, to the extent possible, and create a final Ozone ISA so that it may be available to inform a proposed decision on any necessary revisions of the NAAQS by the spring of 2020.
 - Based on initial feedback from the CASAC and while making necessary adjustments to the draft Ozone ISA, keep production of the Ozone Policy Assessment, including relevant exposure and risk assessment work, on schedule to create a final Ozone Policy Assessment by the spring of 2020.
 - For those comments and recommendations that are more substantial or cross-cutting and which cannot be fully addressed in this timeframe, develop a plan to incorporate these changes in future Ozone ISAs as well as ISAs for other criteria pollutant reviews.

I believe that sound science must be the foundation upon which all the EPA's regulatory and policy decisions are based. Independent reviews such as those of the CASAC help ensure that the agency uses the best available science to fulfill its mission to protect human health and the environment. It is important for everyone to remember that the *Clean Air Act* envisions a continual NAAQS review. As soon as one five-year review ends, the next five-year review begins. The agency will constantly review the latest science for each NAAQS review.

Thank you for your hard work and thoughtful review of the Draft Ozone ISA. I look forward to regular interaction with the CASAC as the agency continues to meet its statutory mandate to regularly review and, as necessary, update each NAAQS.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew R. Wheeler", with a long horizontal flourish extending to the right.

Andrew R. Wheeler