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**Testimony of  
Arthur A. Cerullo  
Board of Directors  
American Lung Association  
on  
EPA's Reconsideration of the  
National Ambient Air Quality Standards for Ozone**

**To the U.S. Environmental Protection Agency**

Docket ID No. EPA-HQ-OAR-2005 -0172

**February 2, 2010  
Arlington, Virginia**

Good morning. My name is Arthur Cerullo and I am Speaker of the Nationwide Assembly of the American Lung Association. I have been a volunteer for the Lung Association for more than 20 years and have served as the president of the American Lung Association of Maine. Thank you for the opportunity to share the position of the American Lung Association on EPA's proposed national air quality standards for ozone.

I'm from Maine, and if you've ever visited our beautiful state, you know why we treasure the outdoors—our majestic mountains, crystal lakes and bracing coastal waters. Our summers are short, so we hate to miss a single chance to be outdoors. But one thing we are often missing is a clear blue sky because of smog. Acadia National Park, one of the most beautiful parks in the country is plagued by poor air quality much of the summer. Too often, smog from both local and distant sources obscures the view of the first light of day in the United States at the top of Cadillac Mountain. This is why the mission of the American Lung Association means so much to me, and why we are committed to the fight for healthy air. Unhealthy, smog-filled air robs us of the ability to enjoy the outdoors, for fear of wheezing, an asthma attack or even death.

Key to our fight for healthy air has been our work to support stronger national ambient air quality standards. We recognize the critical role that national air quality standards play—that these standards quite literally drive the work we do as a nation to clean up air pollution.

We are pleased that the EPA is reconsidering the recommendations of the expert scientists, public health and medical societies, including your own Clean Air Scientific Advisory Committee.

The American Lung Association calls on EPA to adopt a primary national ambient air quality standard for ozone of 60 parts per billion averaged over eight hours.

The Clean Air Act requires EPA to set a standard that protects public health with an adequate margin of safety. What does that mean, really—"to protect public health with a margin of safety"?

First, we believe that it means that EPA should follow the advice of the 23 distinguished and independent air pollution experts who form the EPA's Clean Air Scientific Advisory Committee. They gave unprecedented unanimous support for a standard within the range EPA is considering.

These expert scientists reviewed more than 1,700 studies. They saw clear evidence of the harm that ozone can do to children, older people, people who exercise or work outdoors, people with lung diseases like asthma and chronic obstructive pulmonary disease. They looked at studies that tracked ozone pollution in scores of cities across the nation and found that ozone levels need to be much, much lower. Other studies and found that people with only mild asthma could be harmed if they breathed ozone at concentrations much, much lower than the standard.

After EPA selected the inadequate standard in 2008, the members of this expert team of scientists wrote a letter urging that the next time the standard was reviewed, the Administrator should finally follow their advice. This is that opportunity.

Second, it means that EPA should select the most protective level within that range. EPA has evidence from a clinical study that found that ozone harmed the lungs of healthy young adults who breathed ozone at levels within the range you're considering. That's the gold standard of testing. Researchers cannot test children or people with serious asthma in a lab—the risk of harm for them is too great. That's why the Clean Air Act requires that EPA include a margin of safety in the standard—to provide an extra layer of protection for those who need this the most. That's why the American Lung Association and groups like the American Medical Association, the American Academy of Pediatrics, the American Thoracic Society and the American Public Health Association urged you to provide that protection and set the standard at 60 parts per billion.

Ozone air pollution poses health risks for infants, children, teenagers, seniors, and people with asthma and other lung diseases. For these people, smog-polluted air means more breathing problems, aggravated asthma, fear-filled trips to the emergency room, and even admission to the hospital. For children growing up, breathing high levels of ozone routinely in the summer may mean that their lungs do not develop their full function—a risk that can threaten their health for the rest of their lives. For some, ozone threatens premature death.

The science is clear. The law is clear. EPA has a legal requirement to set the standard where it protects the health of the public with a margin of safety. This is particularly important for people who are more vulnerable to the health effects of ozone. Thankfully, I'm not one of them. I'm an avid cyclist—as a matter of fact, I first became involved with the Lung Association when I volunteered to ride in their Trek Across Maine fundraiser. But every year, I ride for those who can't breathe as easily as I can—especially for kids with asthma, who can't ride their own bikes, or even go outside on high-ozone days, for fear of landing in the hospital, gasping for breath.

A tighter, more protective ozone standard is key to reach the goal of healthy air. On behalf of the American Lung Association, I urge you to adopt a substantially stronger ozone standard. Those whose health literally hangs in the balance, to people like me who just want to enjoy the outdoors, are depending on you to protect our lungs and our health.

Thank you again for your consideration.