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**Testimony of Paul G. Billings
Senior Vice President, Advocacy & Education
American Lung Association
to the**

**U.S. Environmental Protection Agency on the proposed
National Ambient Air Quality Standards for Ozone
Washington, DC**

January 29, 2015

Good morning. I am pleased to speak today in support of strengthening the National Ambient Air Quality Standard for Ozone. My name is Paul Billings and I am Senior Vice President, Advocacy & Education for the American Lung Association. The American Lung Association is the nation's oldest voluntary health organization. Our mission is to save lives by improving lung health and preventing lung disease. Air pollution, ozone smog, harms health. The Clean Air Act requires EPA to set standards that protect health.

Today marks the third time in eight years that I have testified before EPA urging a standard of 60 parts per billion. Five years ago, in February, 2010, I spoke in support of this much more protective standard. In August, 2007 in Philadelphia, the American Lung Association called 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 the standards be set at levels that do not harm health, and include an adequate margin of safety. This clear intent of Congress has been affirmed by a unanimous decision of the Supreme Court.

With this review, EPA has a chance to correct a major mistake. In 2008, EPA chose to ignore the science and the law. EPA set an ozone standard that failed to protect public health and certainly did not include an adequate margin of safety. Unfortunately, President Obama and EPA affirmed that mistake in 2011. The current review affords the agency the opportunity to set the right standard at 60 ppb over 8 hours and move quickly to implement the standard with the requisite pollution cleanup.

As I have testified before, clean, healthy air is personal for me and my family. My wife and I are blessed to have two active daughters. Our youngest, who runs track and plays soccer, has asthma, and hot, smoggy

Advocacy Office:

1301 Pennsylvania Avenue NW, Suite 800
Washington, DC 20004
Ph: 202-785-3355 F: 202-452-1805

National Office:

55 W. Wacker Drive, Suite 1150 | Chicago, IL 60601
Ph: 312-801-7630 F: 202-452-1805 Info@Lung.org

days make it harder for her to breathe. Smog-induced asthma can mean more than the difference between winning and losing a race. It can be much more serious, leading to wheezing and struggling for breath.

In my wife's fifth grade class in Wheaton, Maryland, there are too many children with asthma who are at risk from air pollution. The Clean Air Act requires that the ozone standard protect all children, whose lungs are still developing.

Their families, my family and millions of others with asthma, chronic obstructive pulmonary disease (COPD) and other chronic conditions deserve to know the truth about the quality of the air we are breathing. The current standard misleads all of us.

The law is clear that the standard must be based solely on one question: at what level does ozone harm health? But the law will not stop some of the individuals and organizations who continue to make the same outrageous claims about costs that they have been making for years. These same claims have been proven false. You will hear specious arguments about feasibility -- again, clearly not relevant to the decision before the agency. But, understand that such claims are unfounded.

We have tools in place to help meet strong new standards. Pollution cleanup is coming from the Tier 3 vehicles and lower-sulfur gasoline, cleaner power plants, and additional plans to clean up carbon pollution and methane. But, we also know that too many power plants are not using NOx controls that are already installed. Simply running the pollution controls, together with taking advantage of additional opportunities for further reductions from large trucks and other mobile, stationary and area sources, will help most areas meet new, more protective standards. As you know, cost and feasibility will be fully considered during the implementation phase of the process.

Some arguments are absurd. A strong ozone standard will not block a new hospital from being built, but a new standard may help keep someone you love from having to be rushed to the hospital.

Finally, you will hear shrill claims about uncertainty. I want to be clear. Setting a standard of 60 parts per billion will provide more certainty and cleaner air.

The Clean Air Scientific Advisory Committee Ozone Review Panel – 20 esteemed and independent scientists – looked at the evidence from 2,000 studies. These scientists have unanimously concluded that EPA must set a standard between 60 and 70 ppb. They wrote, “***the recommended lower bound of 60 ppb would certainly offer more public health protection than levels of 70 ppb or 65 ppb and would provide an adequate margin of safety.***”¹

¹ Letter from Dr. H. Christopher Frey, Chair Clean Air Scientific Advisory Committee to The Hon. Gina McCarthy, Administrator U.S. Environmental Protection Agency June 26, 2014
[http://yosemite.epa.gov/sab/sabproduct.nsf/5EFA320CCAD326E885257D030071531C/\\$File/EPA-CASAC-14-004+unsigned.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/5EFA320CCAD326E885257D030071531C/$File/EPA-CASAC-14-004+unsigned.pdf)



Remember, ozone is a killer. A standard set at 60 ppb will prevent up to 7,900 premature deaths, 1.8 million asthma attacks in children and 1.9 million missed school days each year. It certainly will provide essential health protection.

There is a scientific consensus. The law is unambiguous. EPA must adopt the standard that protects the health of the public – with an adequate margin of safety. On behalf of the American Lung Association, I urge you to follow the law and the science and remember the words of CASAC: “60 ppb would certainly offer more public health protection than levels of 70 ppb or 65 ppb.”²

Thank you.

² Frey to McCarthy June 26, 2014

