



June 13, 2022

The Honorable Michael Regan, Administrator
U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Sent via Regulations.gov

Re: Determinations of Attainment by the Attainment Date, Extensions of the Attainment Date, and Reclassification of Areas Classified as Marginal for the 2015 Ozone National Ambient Air Quality Standards, EPA-HQ-OAR-2021-0742

Dear Administrator Regan:

Thank you for this opportunity to comment on EPA's determinations of the attainment status of several Marginal nonattainment area for the 2015 70 parts per billion (ppb) Ozone National Ambient Air Quality Standards based on their attainment deadlines.

The undersigned health organizations support the reclassification of the 24 areas that failed to attain the standard to be redesignated as Moderate nonattainment areas.

EPA proposes to determine the Atlanta metro Marginal nonattainment area as having attained the standard based on its 2019-2021 design values, which are exactly at 70ppb. The years of 2020 and 2021 were characterized by the unusual and unique events related to the COVID-19 pandemic (including significant reductions in traffic) which could have significantly influenced the ozone levels in the region. Another factor potentially skewing the averaging is the likely removal of high ozone days via claims of exceptional events due to the large number of fires in the western states in 2020, which was among the top five years with largest wildfire acreage burned since 1960.¹ We therefore ask EPA to redesignate the Atlanta metro area as a Moderate NAA for the 2015 standard.

¹ Congressional Research Service (CRS). (2022, May 2). Wildfire Statistics. <https://sgp.fas.org/crs/misc/IF10244.pdf>

We oppose granting one-year attainment date extensions to areas not meeting the standards.

Ozone is a powerful lung irritant. When inhaled, it causes inflammation and other damage that can impact multiple body systems. Ozone exposure can also shorten lives. Short-term exposure causes breathing problems such as chest tightness, coughing, shortness of breath and worsened symptoms for people with asthma and COPD.² Long-term exposure may cause lasting harm to respiratory health. Ozone exposure also increases the risk of metabolic disorders like diabetes;³ harm to the central nervous system;^{4,5} reproductive and developmental harm, including preterm birth and stillbirth;^{6,7} possible cardiovascular effects;⁸ and premature death.⁹

Anyone who spends time outdoors when ozone levels are high is at risk, but pregnant people and fetuses; babies and children; people over 65; and people with asthma, COPD or other lung diseases are at greater risk of harm.

Climate change impacts will add to the urban air pollution burden that could bring more areas into non-attainment and interfere with maintenance areas. We have long advocated for an ozone standard no higher than 60 ppb that is warranted by science to protect public health. Canada, the European Union and Australia all have their ozone standards around 60 ppb, while the WHO recommends a 51 ppb ozone standard¹⁰.

EPA must be proactive in fostering collaboration among states to facilitate the development and adoption of best technological practices for regional pollution control and attendant public health benefits. The Agency should seize this opportunity to enforce the implementation of effective emissions control technologies expeditiously to ensure public health benefits from standards promulgated seven years ago.

Signed,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Lung Association
American Public Health Association
Asthma and Allergy Foundation of America
Children's Environmental Health Network
Medical Students for a Sustainable Future

² U.S. EPA. Integrated Science Assessment for Ozone and Related Photochemical Oxidants. April 2020. EPA/600/R-20/012. Section 3.1.4.1.

³ U.S. EPA. 2020, Section 3.2.4.6.

⁴ U.S. EPA. 2020, Section 5.1.3.

⁵ U.S. EPA. 2020, Sections 7.2.1 and 7.2.2.

⁶ Gao Q, Zang E, Bi J, Dubrow R, Lowe SR, Chen H, Zeng Y, Shi L, Chen K. Long-term ozone exposure and cognitive impairment among Chinese older adults: A cohort study. *J Env Int.* 2022; 160:107072.

⁷ U.S. EPA. 2020, Section 7.1.3.

⁸ Mendola P, Ha S, Pollack AZ, Zhu Y, Seeni I, Kim SS, Sherman S, Liu D. Chronic and acute ozone exposure in the week prior to delivery is associated with risk of stillbirth. *Int J Environ Res Pub Health.* 2017; 14:731.

⁹ U.S. EPA. 2020, Sections 4.1 and 4.2.

¹⁰ <https://www.who.int/news-room/feature-stories/detail/what-are-the-who-air-quality-guidelines>

National Association of Pediatric Nurse Practitioners
National League for Nursing
Physicians for Social Responsibility
Public Health Institute