



## Statement of the Ozone Transport Commission to the US Environmental Protection Agency Regarding the 2010 National Ambient Air Quality Standards for Ozone and Transport

Protecting public health from the harmful effects of ozone pollution, including lung damage, respiratory illness and premature mortality, requires the adoption of new, tighter ozone standards without further delay. To adequately protect public health the new standards must be based on the best available science and be set within the range recommended by EPA's Clean Air Scientific Advisory Committee (CASAC). The Ozone Transport Commission (OTC) urges the U.S. Environmental Protection Agency (EPA) to issue the final new primary and secondary ozone National Ambient Air Quality Standards (NAAQS) no later than December 31, 2010, which already represents a four-month delay from EPA's earlier proposed date.

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Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

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Anna Garcia  
Executive Director

Ozone aggravates asthma, leading to more asthma attacks that may require a doctor's attention and the use of additional medication. Increased hospital admissions and emergency room visits for respiratory problems are associated with exposure to ozone. The OTC urges EPA to issue a proposed implementation rule contemporaneously with the new final ozone standards and provide for accelerated implementation of the new standards, including an expedited designation process. Prompt implementation of the new health-protective standards will ensure that the public will breathe healthier air sooner.

According to EPA modeling<sup>1</sup> the CAA Amendments of 1990 are estimated to provide annual health benefits in 2010 by preventing the following:

- 160,000 premature deaths
- 54,000 cases of chronic bronchitis
- 45,000 cardiovascular hospitalizations
- 41,000 respiratory hospitalizations

We urge EPA to build on this remarkable achievement by adopting and implementing the new more protective ozone standards without further delay so that millions of our citizens do not continue to suffer from the serious health impacts of ozone pollution.

When finalizing designations of areas, OTC urges EPA to recognize the dramatic impact of pollutant transport on nonattainment. Studies in the northeast region show that 80 percent or more of the ozone problem in our states is due to interstate transport. EPA should identify regions contributing significantly to another state's nonattainment and designate such contributing areas as nonattainment. If a contributing area has a later attainment date than a downwind area to which it contributes, EPA should require the upwind state to fully address its downwind contribution in a timely manner.

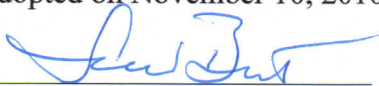
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444 N. Capitol St. NW  
Suite 638  
Washington, DC 20001  
(202) 508-3840  
FAX (202) 508-3841  
e-mail: ozone@otcair.org

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OTC also expects that that EPA will expeditiously propose a second transport rule based on the new ozone NAAQS, as it has committed to do.

Adopted on November 10, 2010



Laurie Burt, Chair

<sup>1</sup> U.S. Environmental Protection Agency, 2010. *The Benefits and Costs of the Clean Air Act: 1990 to 2020*, Office of Air and Radiation/Office of Policy, Washington, D. C.