

July 31, 2018

U.S. Environmental Protection Agency  
EPA Docket Center  
Attention Docket ID No. EPA-HQ-OAR-2013-0566  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

To Whom It May Concern:

On behalf of the National Association of Clean Air Agencies (NACAA), we are pleased to provide the following comments on the U.S. Environmental Protection Agency's (EPA) proposed decision on its review of the primary National Ambient Air Quality Standards (NAAQS) for sulfur oxides ( $\text{SO}_x$ ), as published by the agency on June 8, 2018 (83 Fed. Reg. 26,752). NACAA is a national, non-partisan, non-profit association of 156 air pollution control agencies in 41 states, the District of Columbia, four territories and 116 metropolitan areas. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. These comments are based upon that experience. The views expressed in these comments do not represent the positions of every state and local air pollution control agency in the country.

EPA is proposing to retain the current primary  $\text{SO}_x$  NAAQS without revision. NACAA supports this proposal.

The current standard of 75 parts per billion (ppb), as the 99th percentile of daily maximum 1-hour  $\text{SO}_2$  concentrations, averaged over three years, was set in 2010. At that time, EPA strengthened the primary standard by revoking the 24-hour and annual standards and setting a 1-hour standard "to provide protection from respiratory effects associated with exposures as short as a few minutes based on evidence from health studies that documented respiratory effects in people with asthma exposed to  $\text{SO}_2$  for 5 to 10 minutes while breathing at elevated rates."<sup>1</sup> EPA concurrently amended the ambient air quality monitoring and reporting requirements, calling for the reporting of hourly maximum 5-minute  $\text{SO}_2$  concentrations in addition to hourly concentrations.

In its proposed rule, EPA states that based on its review of health effects evidence and quantitative information, as well as advice from the Clean Air Scientific Advisory Committee (CASAC) – the chartered body of independent science advisors to EPA – and public input received so far, "the Administrator proposes to conclude that the current primary  $\text{SO}_2$  standard is requisite to protect public health, with an adequate margin of safety, from effects of  $\text{SO}_x$  in ambient air and should be retained, without revision."<sup>2</sup>

$\text{SO}_x$  consist of a collection of closely related gaseous compounds, including sulfur dioxide ( $\text{SO}_2$ ) and sulfur trioxide, of which  $\text{SO}_2$  is the most commonly occurring in the atmosphere and has the clearest association with public health impacts. Therefore, in its Integrated Science Assessment, EPA focuses its

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<sup>1</sup> *Review of the Primary National Ambient Air Quality Standards for Sulfur Oxides, Proposed Action*, U.S. Environmental Protection Agency (June 8, 2018), p. 26,753 – <https://www.gpo.gov/fdsys/pkg/FR-2018-06-08/pdf/2018-12061.pdf>

<sup>2</sup> Id. at p. 26,754

evaluation on the health effects evidence for SO<sub>2</sub>.<sup>3</sup> With respect to health effects, EPA states in its Policy Assessment, “Rather than altering our conclusions from the last review, the current evidence continues to support our prior conclusions regarding the key health effects associated with SO<sub>2</sub> exposure. Specifically, the full body of evidence continues to support the conclusion that short-term SO<sub>2</sub> exposures of durations as short as a few minutes are causally related to respiratory effects in at-risk individuals (ISA, section 5.2.1.9). With regard to respiratory effects and long-term exposures [generally, longer than a month], as well as total mortality and short-term exposures, the evidence available in this review is ‘suggestive of, but not sufficient to infer,’ a causal relationship (ISA, sections 5.2.2.7 and 5.5.1.6).”<sup>4</sup>

NACAA supports EPA’s use of the most recent scientific evidence to establish any primary and secondary NAAQS to protect public health and welfare, respectively, and the agency’s reliance on advice from CASAC. In its April 30, 2018 letter to EPA on its review of the agency’s *Policy Assessment for the Review of the Primary National Ambient Air Quality Standard for Sulfur Oxides (External Review Draft – August 2017)*, CASAC states that it “concurs with the EPA that the current scientific literature does not support revision of the primary NAAQS for SO<sub>2</sub>.<sup>5</sup> The Committee further states that “[t]he CASAC notes that the new scientific information in the current review does not lead to different conclusions from the previous review. Thus, based on review of the current state of the science, the CASAC supports retaining the current standard, and specifically recommends that all four elements (indicator, averaging time, form, and level) should remain the same.”<sup>6</sup>

Based on this conclusion by CASAC, NACAA supports EPA’s proposal to retain the current SO<sub>x</sub> NAAQS at this time. NACAA further endorses CASAC’s identification in the Policy Assessment of key uncertainties and areas for future research, model development and data collection associated with reviewing and setting the primary NAAQS for SO<sub>x</sub>.<sup>7</sup>

On behalf of NACAA, we thank you for the opportunity to provide comments on this proposal.

Sincerely,



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Co-Chair  
NACAA Criteria Pollutants Committee



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<sup>3</sup> *Integrated Science Assessment for Sulfur Oxides – Health Criteria*, U.S. Environmental Protection Agency (December 2017), p. xli – [http://ofmpub.epa.gov/eims/eimscomm.getfile?p\\_download\\_id=533653](http://ofmpub.epa.gov/eims/eimscomm.getfile?p_download_id=533653)

<sup>4</sup> *Policy Assessment for the Review of the Primary National Ambient Air Quality Standard for Sulfur Oxides*, U.S. Environmental Protection Agency (May 2018), p. 3-15 – [https://www.epa.gov/sites/production/files/2018-05/documents/primary\\_so2\\_naaqs\\_final\\_pa\\_-may\\_2018.pdf](https://www.epa.gov/sites/production/files/2018-05/documents/primary_so2_naaqs_final_pa_-may_2018.pdf)

<sup>5</sup> CASAC Review of the EPA’s “*Policy Assessment for the Review of the Primary National Ambient Air Quality Standard for Sulfur Oxides (External Review Draft – August 2017)*,” Clean Air Scientific Advisory Committee (April 30, 2018), p. 1 – [https://yosemite.epa.gov/sab/sabproduct.nsf/264cb1227d55e02c85257402007446a4/23631E258D63BDEB8525827F0075335E/\\$File/EPA-CASAC-18-002.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/264cb1227d55e02c85257402007446a4/23631E258D63BDEB8525827F0075335E/$File/EPA-CASAC-18-002.pdf)

<sup>6</sup> Id. at p. 3

<sup>7</sup> *EPA Policy Assessment*, p. 3-67