

October 1, 2020

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

*Submitted via Regulations.gov*

**RE: Comments - Docket ID No. EPA-HQ-OAR-2018-0279: Review of the Ozone National Ambient Air Quality Standards**

Dear Administrator Wheeler:

As professionals whose job is to safeguard the health of our patients and communities, we urge you to set stronger limits on ozone pollution. Scientific research shows that the current National Ambient Air Quality Standard (NAAQS) for ozone is too weak and does not sufficiently protect Americans.

There is a large and compelling body of research that shows ozone pollution poses serious health threats including<sup>1</sup>:

- respiratory harm (e.g., worsened asthma, worsened COPD, inflammation)
- early death (both short-term and long-term exposure)
- cardiovascular harm (e.g., heart attacks, strokes, heart disease, congestive heart failure)
- harm to the central nervous system
- reproductive and developmental harm

Anyone can suffer health harms from ozone pollution, and millions of Americans face greater risk – including more than 16.4 million adults with COPD and more than 24.8 million adults and 5.5 million children with asthma.<sup>2</sup> People with lung disease, heart disease, high blood pressure, coronary artery disease, congestive heart failure and lung cancer, and people who are obese, also face higher risk from ozone pollution.<sup>3</sup>

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<sup>1</sup> U.S. Environmental Protection Agency, *Integrated Science Assessment for Ozone and Related Photochemical Oxidants*, Fed. Reg. 85:76 (April 20, 2020) p. 21849

<sup>2</sup> Centers for Disease Control and Prevention. National Center for Health Statistics. National Health Interview Survey, 2018. Analysis performed by the American Lung Association Epidemiology and Statistics Unit using SPSS software.

<sup>3</sup> U.S. Environmental Protection Agency, *Integrated Science Assessment for Ozone and Related Photochemical Oxidants*, Fed. Reg. 85:76 (April 20, 2020) p. 21849

Further, new research provides evidence that ozone can cause serious harm even at much lower levels than the current standard. In a 2017 scientific paper, researchers provided additional evidence in a nationwide study that older adults faced a higher risk of premature death even when levels of ozone pollution remained well below the current national standard.<sup>4</sup>

As health professionals, we are responsible for the health of the patients and communities we serve – but the quality of the air they breathe, which is absolutely critical to their health, is largely outside of their control. That’s why EPA’s work setting the NAAQS based on the latest, best science is so important. The agency has a responsibility to safeguard the health of vulnerable Americans across the nation from these pollutants.

On behalf of our patients and communities, we call on the Environmental Protection Agency to take the latest scientific evidence into account and strengthen the National Ambient Air Quality Standards for ozone by setting the level of the standard no higher than 60ppb in order to adequately protect our patients’, families’ and communities’ health.

Sincerely,

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<sup>4</sup> Di Q, Dai L, Wang Y, Zanobetti A, Choirat C, Schwartz JD, Dominici F. Association of Short-Term Exposure to Air Pollution with Mortality in Older Adults. JAMA. 2017; 318: 2446-2456.

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