

November 3, 2023

The Honorable H. Christopher Frey, Ph.D.
Assistant Administrator for Research and Development
Office of Research and Development
Agency Science Advisor
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27711

Re: National Ambient Air Quality Standards for ozone and related photochemical oxidants

Dear Dr. Frey:

The undersigned national health and medical organizations have called for a primary ozone National Ambient Air Quality Standard (NAAQS) of 55-60 parts per billion, in accordance with the current science and the near-universal recommendations of the Clean Air Scientific Advisory Committee (CASAC) ozone panel during the reconsideration process. Finalizing a more protective standard is an urgent health imperative. Our organizations are deeply concerned with ensuring EPA completes the recently announced ozone NAAQS review process by December 2025, as the Clean Air Act requires.

The Clean Air Act mandates a five-year timeline between successive reviews. After rescinding the 2020 ozone NAAQS reconsideration process, the agency initiated the review with a [call for information](#) on August 24, 2023 as a prelude to preparing an Integrated Science Assessment (ISA). As agency staff stated, the reconsideration process did not re-set the five-year NAAQS review clock. Therefore, EPA must complete the ozone NAAQS review by December 2025.

The NAAQS review process must be thorough and efficient, allowing adequate - but not unduly extended - periods for document (Integrated Review Plan (IRP), ISA, Policy Assessment (PA), Risk/Exposure Assessment (REA)) preparation, for consultation with and input from CASAC, and for public comment. Although we strongly disagree with EPA's decision to suspend the reconsideration process, thanks to CASAC's comments and input during that process, EPA got a head start on the new review. The output from that process benefits the newly initiated review by allowing EPA to move more quickly than it might move in other reviews. Yet, in the August 21, 2023 [press release](#) announcing the new review, EPA has outlined a more-than year-long process just to

develop the IRP (convening a public science and policy workshop in spring 2024, summarizing the proceedings of the workshop in summer 2024, releasing IRP in fall 2024). That schedule can and must be hastened.

In the reconsideration process, the ozone CASAC panel near-unanimously (17-1) concluded that the scientific evidence to-date unequivocally demonstrates that the current primary standard is entirely inadequate to protect public health. They further concluded that the scientific evidence supports their recommendations of alternative primary standard of 55-60 ppb. In doing so, they stated that there was no need for a new ISA, but that a more robust analysis of data presented in the 2020 ISA was warranted. EPA could release its re-assessment of older studies and assessment of newer studies in an appendix or an addendum to the 2020 ISA and therein address the specific issues raised by the 2022 CASAC panel. Alternatively, EPA could present this information in [technical memos](#), as it did for the reconsideration process. The CASAC experts also disagreed with and raised concerns about several pivotal decisions and assumptions in EPA's analyses based on which the agency concluded that the current primary standard of 70 ppb did not warrant revision in its 2020 decision.

In light of the above, we ask that EPA focus on addressing the concerns raised and recommendations made by the CASAC during the reconsideration process and also seriously consider the input from public comment to expedite the process without sacrificing scientific rigor in its assessments. Such a systematic approach is necessary to complete the ozone NAAQS review by December 2025 and for the public to experience the attendant benefits of stronger standards without additional delays.

Thank you,

Allergy & Asthma Network

Alliance of Nurses for Healthy Environments

American Lung Association

American Thoracic Society

Asthma and Allergy Foundation of America

Climate Psychiatry Alliance

International Society for Environmental Epidemiology - North America Chapter (ISEE-NAC)

Medical Society Consortium on Climate and Health

National Association of Pediatric Nurse Practitioners

Physicians for Social Responsibility