

**Public Comments on Ozone NAAQS
Before the U.S. Environmental Protection Agency (EPA)
By the Southwest Pennsylvania Environmental Health Project (EHP)
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Alison L. Steele
Executive Director
Southwest Pennsylvania Environmental Health Project
2001 Waterdam Plaza Drive, Suite 201
McMurray, PA 15317
astele@environmentalhealthproject.org
724-249-7501

Good afternoon. My name is Alison L. Steele. I am the executive director of the Southwest Pennsylvania Environmental Health Project (EHP), a nonprofit public health organization that is headquartered in McMurray, Pennsylvania and has worked with concerned communities nationwide. Our team is a skilled group of health care providers, scientists, community educators, and data analysts. Our organization has become a national leader in the comprehensive understanding of public health consequences related to shale gas development, including the effects of air quality on individuals' health.

I am commenting today on behalf of EHP to express our position that the Environmental Protection Agency's proposal to retain the current National Ambient Air Quality Standards for ozone pollution, without revision, jeopardizes the health of countless Americans.

As we have seen in the regions we serve, ozone pollution, even at low levels, can trigger immediate, dangerous health impacts. People exposed to ozone pollution have a greater risk of developing respiratory issues, like persistent coughs, asthma, or chronic obstructive pulmonary disease (COPD).¹ Those with existing health conditions may suffer worsening symptoms and are more likely to end up in the hospital.² Senior citizens and children are especially at risk of experiencing negative health outcomes when exposed to ozone pollution, and pregnant women may have a higher risk of delivering babies pre-term or with birth defects.³

Long-term exposure to ozone can increase the risk of premature death.⁴ The Journal of the American Medical Association in 2017 found strong evidence of increased mortality from ozone pollution, with some risks occurring even at levels below the current air quality standard.⁵ Those living near sources of ozone pollution who have infectious lung diseases, such as COVID-19, are also more likely to develop advanced symptoms, especially if they reside in environmental justice communities.⁶

Every day, my organization confronts health effects that coincide with under-regulated air pollution. The shale gas industry – through the drilling, extraction, and transport of fracked shale gas – continues to emit ozone-producing nitrogen oxides and VOCs across the country, in the back yards of Pennsylvania, Texas, Colorado, and New Mexico, among others.

We routinely interact with people whose health has been negatively impacted by living in proximity to shale gas development. We hear from people who are scared for themselves, for their loved ones, and for their neighbors. And that is why maintaining the status quo is not good enough for them. A stronger ozone standard can give them some added peace of mind and can go a long way toward protecting their health.

The EPA's proposal comes at a time when our nation is at a crossroads with respect to ozone pollution. We can do nothing – as the current proposal suggests – and continue on a path to inevitable health declines and increased morbidity, or we can do something that gives us a chance to lower the risk of health complications, reduce deaths related to air pollution, and offer hope to at-risk families.

We urge the EPA to follow the science and set stronger National Ambient Air Quality Standards for ozone pollution. Thank you.

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

² Lin S, Liu X, Le LH, and Hwang S-A. Chronic exposure to ambient ozone and asthma hospital admissions among children. *Environ Health Perspect.* 2008; 116:1725-1730.

³ Salam MT, Millstein J, Li YF, Lurmann FW, Margolis HG, Gilliland FD. Birth outcomes and prenatal exposure to ozone, carbon monoxide, and particulate matter: Results from the Children's Health Study. *Environ Health Perspect.* 2005; 113: 1638-1644; Morello-Frosch R, Jesdale BM, Sadd JL, Pastor M. Ambient air pollution exposure and full-term birth weight in California. *Environ Health.* 2010; 9: 44.

⁴ Jerrett M, Burnett RT, et al. Long-term ozone exposure and mortality. *N Engl J Med.* 2009: 1085-1095.

⁵ Di Q, Dai L, Wang Y, et al. Association of Short-term Exposure to Air Pollution With Mortality in Older Adults. *JAMA.* 2017;318(24):2446–2456.

⁶ Olivieri, D and Scoditti, E. (2005). Impact of environmental factors on lung defences. *European Respiratory Review*, 14, 51-56.