



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 23 2015

OFFICE OF
AIR AND RADIATION

The Honorable Fred Upton
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

Thank you for your letter of November 13, 2014, to U.S. Environmental Protection Agency Administrator Gina McCarthy, inquiring about the cost associated with bringing areas into attainment with the 2008 ozone National Ambient Air Quality Standards (NAAQS). The Administrator asked that I respond on her behalf.

At the time the 2008 NAAQS ozone standard was set, we estimated both the costs and benefits of implementation, in accordance with guidance from the Office of Management and Budget. In your letter, you accurately cited the anticipated costs of implementing the 2008 ozone NAAQS in the year 2020. I should also note that there are significant annual benefits associated with implementation of the 2008 ozone NAAQS that are estimated to range between \$2 billion and \$17 billion per year.¹ These benefits include 260 to 2,300 avoided premature mortalities per year, many fewer cases of acute bronchitis, many fewer cases of aggravated asthma, and large reductions in the number of days when people miss work or school (243,000 days) and when people must restrict their activities (750,000 days) because of ozone-related illnesses.

As you note, EPA designated areas where air quality does not meet the 2008 ozone health standard of 75 ppb in May 2012. The large majority of those areas were designated as "marginal" nonattainment, because air quality did not exceed 75 ppb by a substantial amount. Once air monitoring data for 2014 are certified by the states, submitted to and reviewed by EPA, which is expected by early summer, we will be able to determine which marginal areas are on track to meet the 2015 attainment date. For any areas not on track, EPA will work with those areas to assess whether an extension might be warranted, as provided in the Clean Air Act, or what other steps should be taken to continue to improve air quality in those areas. I will note that 2012 was a high year for ozone formation in several parts of the country due to high temperatures and drought or drought-like conditions. Ozone levels in 2013 were generally lower, and preliminary data suggest that they were in 2014 as well.

¹ See "Final Ozone NAAQS Regulatory Impact Analysis," March 2008, available at: http://www.epa.gov/ttn/ecas/regdata/RIAs/452_R_08_003.pdf.

States with areas designated as moderate nonattainment are working now on their clean air plans, due in July 2015. Plans for serious and above areas are due in July 2016. Those plans will describe the measures states have determined are appropriate. Until that information is available, EPA cannot provide any further cost estimates or opine on what the state plans may or may not include.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Cheryl Mackay in the EPA's Office of Congressional and Intergovernmental Relations at mackay.cheryl@epa.gov or (202) 564-2023.

Sincerely,



Janet G. McCabe
Acting Assistant Administrator