

New England
Environmental
Commissioners



October 27, 2005

Stephen L. Johnson, Administrator
USEPA Headquarters
Ariel Rios Building
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Dear Administrator Johnson:

*Gina McCarthy,
Commissioner
Connecticut Department of
Environmental Protection*

*Dawn Gallagher,
Commissioner
Maine Department of
Environmental Protection*

*Robert W. Gollodge, Jr.,
Commissioner
Massachusetts Department of
Environmental Protection*

*Michael Nolin,
Commissioner
New Hampshire Department of
Environmental Services*

*W. Michael Sullivan,
Director
Rhode Island Department
Environmental Management*

Fine particulate matter poses one of the greatest public health risks in our region and across the nation. The preponderance of health studies suggest that significant segments of the U.S. population are experiencing adverse health effects from exposures to ambient concentrations of fine particles (PM_{2.5}), even at levels at or below the current national ambient air quality standard (NAAQS). The U.S. Environmental Protection Agency (EPA) has the opportunity to greatly reduce this risk by adopting an appropriately protective NAAQS for fine particles. We write to offer our thoughts and urge you to act decisively on this critical public health issue.

A large portion of the Northeast population is vulnerable to the health effects of airborne particulate matter at the concentrations currently measured on many days across the region. Sensitive populations include people with cardiovascular and respiratory conditions, diabetes, the young and elderly. Further, the population density of our region is among the highest in the nation, with over 30 million persons living in urban areas that typically experience the highest particulate matter levels. These areas have asthma rates that are among the highest in the nation and asthmatics are particularly sensitive to particulate matter.

Given the Clean Air Act's mandate to protect public health—including susceptible populations—with an adequate margin of safety, the Northeast states believe that epidemiologic and risk assessment evidence clearly supports more stringent PM_{2.5} standards. While both EPA and the Clean Air Scientific Advisory Committee (CASAC) have concluded that a more health protective particulate matter standard is warranted, the broad range of levels and forms proposed in the EPA Staff Paper could result in adoption of a suite of standards that will not be adequately protective in our region.

Based on the weight of evidence of health effects findings and regional demographic and monitoring data, the Northeast states believe that a 24-hr PM_{2.5} standard of 30 µg/m³ (98th percentile form) and an annual PM_{2.5} standard of 12 µg/m³ are necessary to protect public health across the region. These levels are within the range offered in the EPA Staff Paper. A requirement to reduce current emissions of PM_{2.5} and its precursors to meet a 12/30 µg/m³ standard would result in 84 percent of the region's population directly benefiting from improved air quality, including about five times

