



Please contact the Environmental Protection Agency before March 17 and ask them to retain the current Ozone National Ambient Air Quality Standard (NAAQS).

Under the Clean Air Act, EPA must update its assessment of the latest science and consider *whether* any changes are needed to National Ambient Air Quality Standards (NAAQS) at least every five years. EPA has significant discretion in determining what is “requisite” to protect public health when setting NAAQS. EPA missed its review deadline for ozone in 2013 and was sued by environmental groups, so a court has ordered EPA to issue a final rule by Oct. 1, 2015.

On December 17, 2014, EPA proposed to lower the current 75 parts per billion (ppb) limit to between 65 and 70 ppb. It also invited comment on retaining the current standard as well as going down to 60 ppb. EPA’s science advisors recommended that the standard be lowered to between 60 and 70 ppb based on their view of the evidence. The revisions could place most of the country in nonattainment, putting five times more paper and wood product mills at risk of permitting delays, increased energy costs, and potential job losses.

We believe the science does not support a further tightening of the ozone standards. EPA continues to rely on studies that reinforce their concerns while ignoring or giving little weight to negative or ambiguous studies. States have yet to implement the tighter 2008 standards including development of State Implementation Plans. Air quality has gotten significantly better over the last several years and will continue to improve due to other EPA rules on the books even if the ozone NAAQS is not changed. Nitrogen oxide (NOx) and volatile organic compound (VOC) emissions from pulp, paper, and wood product mills continue to decline as well.

Comments are due by March 17, 2015. We encourage member companies, individual mills, and mill workers to all submit comments, at your discretion.

Electronic: Comments may be submitted [HERE](http://www.regulations.gov) (<http://www.regulations.gov>, docket number “EPA–HQ–OAR–2008–0699”).

You may either:

1) Upload the comments as a pdf. Make sure to include “Please see attached letter for our comments on EPA’s proposed Ozone NAAQS Rule” in the comment text box.

or

2) Copy the text of the letter directly into the comment box.

Mail: Comments submitted by U.S. Mail should be addressed to: EPA Docket Center (EPA/DC), Mailcode 28221T, Attention Docket ID No. OAR–2008–0699, 1200 Pennsylvania Ave. NW., Washington, DC 20460. Please include a total of two copies.

Thank you.