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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 9, 2018

Office of Air Quality Planning and Standards
Mail Code: C504-06
Environmental Protection Agency
Research Triangle Park, NC 27711

Attn: Docket ID No. EPA-HQ-OAR-2013-0566

Re: Review of the Proposed Rule for the Primary National Ambient Air Quality Standards for Sulfur Oxides

To Whom It May Concern:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to respond to the United States Environmental Protection Agency's (EPA's) announcement of a public comment period for the review of the Proposed Rule for the Primary Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). The TCEQ is supportive of EPA's proposed conclusion that the current primary one-hour SO₂ NAAQS should be retained without revision. Although the TCEQ disagrees with certain decisions made in the EPA's assessment process, as detailed in our comments on prior assessment documents, the TCEQ agrees that the current one-hour primary SO₂ NAAQS offers sufficient protection of public health with an adequate margin of safety.

In addition to requesting comments on the proposed NAAQS, the EPA also invited comment on the science policy judgments inherent in the proposed decision. To that end, the TCEQ would like to reiterate the major points from the draft SO₂ Integrated Science Assessments, draft Risk and Exposure Assessment Planning Document, draft Risk and Exposure Assessment, and draft Policy Assessment. As in all of its NAAQS evaluations, the TCEQ encourages the EPA to more fully consider exposure measurement error and more accurately reflect all uncertainty, both through the use of uncertainty bounds in presentation of risk assessment results as well as the use of important caveats in its written assessment documents and announcements. In specific regard to the SO₂ NAAQS, the EPA should also reconsider its key health endpoint (changes in specific airway resistance). Although the TCEQ agrees with the EPA's reliance on data from controlled human exposure studies instead of epidemiological studies, there is very limited understanding of natural inter- and intra-individual variability in specific airway resistance and no scientific or medical justification for the noted changes being adverse. Further, the EPA should reconsider its use of a no-threshold model for bronchoconstriction, which is fundamentally understood to have a threshold. The TCEQ's more detailed comments related to these points from the assessment documents are attached for your convenience.

If there are any questions concerning the TCEQ's comments, please contact Ms. Lindsey Jones, Toxicology Division, at 512-239-1784 or lindsey.jones@tceq.texas.gov.

Sincerely,


Stephanie Bergeron Perdue
Interim Executive Director

Enclosures