# TCEQ LogoNational Comments

# Executive Review Summary

**TCEQ Proposed Comments On:**

On June 8, 2018, the United States Environmental Protection Agency (EPA) published a proposed rule in the Federal Register (83 FR 26752) that documents the EPA’s review of the primary national ambient air quality standard (NAAQS) for sulfur oxides (proposed rule). The proposed rule was initially made available for public review and comment until July 23, 2018. A subsequent *Federal Register* announcement on June 21, 2018 (83 FR 28843), extended the public comment period to August 9, 2018.

**Overview of Proposal:**

The proposed rule presents the EPA’s review and assessment of the current scientific literature related to ambient levels of sulfur oxides and potential health risks as part of its current review of the primary NAAQS. The proposed rule provides the EPA Administrator’s proposed decision to retain the current NAAQS without revision. Under a proposed consent decree (82 FR 4866), the EPA will finalize the review of the primary SO2 NAAQS no later than January 28, 2019. The EPA last revised the primary SO2 NAAQS in 2010 based on the available scientific literature.

**Summary of Comments:**

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. As in all of its NAAQS evaluations, the TCEQ encourages future reviews to include more consideration of exposure measurement error and a more accurate reflection of 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.

**Lead Office:** Toxicology Division

**Internal Coordination:**  Lindsey Jones, Toxicology Division

**Office of Legal Services:**

**Director Approval:** Michael Honeycutt, Toxicology Division

**Deadline**: August 9, 2018