# TCEQ LogoNational Comments

# Executive Review Summary

**TCEQ Proposed Comments On:**

On September 22, 2016, the United States Environmental Protection Agency (USEPA) published a notice in the Federal Register (81 FR 65353) that the first external Draft Policy Assessment for the Review of the Primary National Ambient Air Quality Standards for Nitrogen Dioxide is available for public review and comment.

**Overview of Proposal:**

The Policy Assessment (PA) for the Review of the Primary National Ambient Air Quality Standards for Nitrogen Dioxide has been prepared as part of USEPA’s ongoing review of the primary (health-based) national ambient air quality standards (NAAQS) for nitrogen dioxide (NO2). It presents analyses and preliminary conclusions regarding the policy implications of the key scientific and technical information that informs this review. When final, the PA is intended to “bridge the gap” between the scientific evidence and technical information and the judgments required of the USEPA in determining whether to retain or revise the current standards.

**Summary of Comments:**

The TCEQ agrees with and supports the USEPA’s preliminary conclusion that the current 1-hour and annual primary NO2 NAAQS should be retained without revision. Given available scientific literature and its significant uncertainty, the levels of the current 1-hour and annual primary NAAQS offer sufficient protection of public health with an adequate margin of safety. The TCEQ again encourages the USEPA to give careful consideration to the significant limitations in the studies it uses in its risk assessment and causal determinations. Results from controlled human exposure studies should be given significantly more weight than those from epidemiology studies. The TCEQ also encourages the USEPA to re-evaluate the strength of its causality determinations for long-term exposure and respiratory, mortality, and cancer effects and should require a stronger weight-of-evidence to support these causal designations. The TCEQ urges the USEPA to consider the entire body of scientific evidence related to NO2-mediated health effects. The USEPA should equally consider evidence from all high quality studies, whether their results are positive, negative, or null.

**Lead Office:**

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**Internal Coordination:**

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**Director Approval:**

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**Deadline**:

November 22, 2016