# TCEQ LogoNational Comments

# Executive Review Summary

**TCEQ Proposed Comments On:**

On September 19, 2017, the United States Environmental Protection Agency (EPA) published a notice in the Federal Register (82 FR 43756) that the draft Risk and Exposure Assessment for *the Primary National Ambient Air Quality Standards for Sulfur Oxides, External Review Draft* (draft REA) and the *Policy Assessment* for *the Primary National Ambient Air Quality Standards for Sulfur Oxides, External Review Draft* (draft PA) are available for public review and comment.

**Overview of Proposal:**

The REA presents the EPA’s assessment of sulfur dioxide (SO2) exposures and health risks as part of its current review of the National Ambient Air Quality Standard (NAAQS). The PA presents the EPA’s evaluation of the policy implications of the technical information in the REA and Integrated Science Assessment (ISA). Under a proposed consent decree (82 FR 4866), the EPA will issue its Proposed Rule no later than May 25, 2018, and 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 agrees with the EPA’s preliminary conclusion that the current SO2 NAAQS, including the 1-hour duration of the NAAQS, provides adequate protection of public health, the EPA should still work to resolve key issues with its risk assessment. The following technical issues are specifically highlighted.

* Specific airway resistance (sRaw) is inappropriate for this analysis because of limited understanding of adversity and variability.
* The EPA does not justify its use of a no-threshold model and should have conducted a sensitivity analysis that includes a threshold in the exposure-response curve.
* The current construction of exposure categories in the draft REA inappropriately suggests that effects could confidently be measured at concentrations below 100 and 200 ppb.
* The EPA does not provide a rationale for why it did not follow its own REA Planning Document in the selection of study areas and description of their selection criteria.
* The EPA inappropriately describes the locations of two of the three study areas and, instead, should use a standard geographical reference for designating areas of the country.
* The EPA does not provide adequate rationale for creating artificially inflated design values for Fall River and Tulsa in order to just meet the current standard.
* The EPA does not adequately support the large disparity in risk estimates between the study areas.
* The EPA does not quantitatively address the many uncertainties identified in the draft REA.
* The EPA does not include uncertainty bounds in its presentation of risk assessment results.
* The draft REA needs to provide a quantitative analysis and additional discussion to explain the relevance of modeled effect estimates in the three study areas to the actual ambient conditions found across the rest of the country.
* The draft PA inappropriately relies on highly uncertain modeled health effects below concentrations that cause effects in controlled human exposure studies.
* The draft PA needs to more clearly discuss how uncertainties in the draft REA alter the current understanding of at-risk populations.
* The risk assessment does not identify a public health risk with any scientific confidence.

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**Deadline**: October 18, 2017