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January 17, 2006

Air and Radiation Docket and Information Center
U.S. Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Submitted Electronically to: Docket ID EPA-HQ-OAR-2005-0172

Comments on EPA's Draft Staff Paper for Ozone¹

The American Forest & Paper Association (AF&PA) is pleased to have the opportunity to comment on the U.S. Environmental Protection Agency's (EPA's) Draft Staff Paper for Ozone. AF&PA, the trade association and leading voice for the forest products industry, represents over 200 companies and related associations and accounts for approximately seven percent of total U.S. manufacturing output, employs 1.1 million people, and ranks among the top ten manufacturing employers in 42 states. Our members have a significant interest in the review of the ozone (or O₃) National Ambient Air Quality Standards (NAAQS), as the final standards will have a significant effect on hundreds of facilities operated by our industry.

EPA's conclusions in the Staff Paper are based primarily on epidemiological studies that indicate a relationship between elevated ozone exposure and premature mortality. However, ozone controlled human exposure and toxicology studies show no such relationship and directly contradict the epidemiology studies. Furthermore, the Children's Health Study recently concluded that there was no evidence that ozone exposure was associated with decreased lung function in children exercising outdoors. The conclusions EPA draws - based on epidemiological data - appear faulty and need to be reconsidered. Consequently, we recommend that human exposure studies, which provide a better understanding of ozone effects on humans, be used as the primary source for analysis and conclusions.

As noted in our comments of November 2005, human clinical study results must be reconciled with the results of epidemiological studies. Current epidemiological studies are not reliable and should not be used as a basis for risk assessment. Before using such studies for risk assessment, research is needed that considers more biologically complex and nonlinear concentration-response relationships.

Finally, EPA's draft ozone risk assessment does not include newer response modeling data published after 1996. EPA needs to update its ten-year old ozone exposure-response relationships to include newer data suggesting that exposure response relationships are nonlinear.

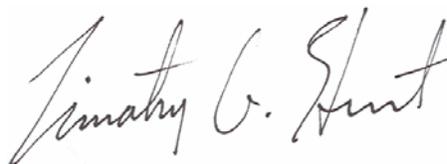
¹ 70 FR 69761, November 16, 2005.

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AF&PA endorses the comments submitted by the American Petroleum Institute (API) and concurs with the points raised in API's comments concerning the use of epidemiological data.

In closing, we urge EPA to include newer, more relevant data in its assessments and develop recommendations based on a balanced review of this updated data. If you have questions on these comments, please do not hesitate to contact me at 202-463-2588.

Sincerely,

A handwritten signature in black ink that reads "Timothy G. Hunt". The signature is written in a cursive style with a large initial 'T' and 'H'.

Timothy G. Hunt
Senior Director, Air Quality Programs

cc: David McKee, US EPA