

April 6, 2015

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U.S. Environmental Protection Agency
EPA Docket Center
Mailcode: 28221T
Attention Docket ID No. EPA-HQ-OAR-2010-0108
1200 Pennsylvania Avenue, NW
Washington, DC 20460

To Whom It May Concern:

On behalf of the National Association of Clean Air Agencies (NACAA), we are pleased to provide the following comments on the U.S. Environmental Protection Agency's (EPA) proposed National Ambient Air Quality Standards (NAAQS) for lead, published by the agency on January 5, 2015 (80 Fed. Reg. 278). NACAA is a national, non-partisan, non-profit association of air pollution control agencies in 41 states, the District of Columbia, four territories and 116 metropolitan areas. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. These comments are based upon that experience. The views expressed in these comments do not represent the positions of every state and local air pollution control agency in the country.

EPA is proposing to retain the current lead NAAQS without revision. The current primary and secondary lead standards – which are identical at 0.15 micrograms per cubic meter, in terms of a rolling three-month average concentration – were established in 2008 after EPA conducted its last review of the NAAQS, concluding – as did the agency's body of independent science advisors, the Clean Air Scientific Advisory Committee (CASAC) – that substantially more protective standards were warranted.

Exposure to lead is associated with numerous adverse impacts including, among others, those on the central nervous system, cardiovascular system and red blood cells. Children are especially, susceptible to the ill effects of lead exposure and can suffer significant loss of cognitive function (e.g., lowered IQ), decreased attention and increased hyperactivity, which may continue into adulthood and impair education and achievement for an entire lifetime. Importantly, there is no evidence of a threshold level at which there are no adverse health impacts associated with exposure to lead. With respect to welfare, lead can have adverse impacts on terrestrial and aquatic organisms.

NACAA supports EPA's use of the most recent scientific evidence to establish primary and secondary NAAQS to protect public health and welfare, respectively. In its June 4, 2013 letter to EPA on its review of EPA's *Policy Assessment for the Review of the*

Lead National Ambient Air Quality Standards (External Review Draft – January 2013), CASAC states the following:

Overall, the CASAC concurs with the EPA that the current scientific literature does not support a revision to the Primary Lead (Pb) National Ambient Air Quality Standard (NAAQS) nor the Secondary Pb NAAQS. Although the current review incorporates a substantial body of new scientific literature, the new literature does not justify a revision to the standards because it does not significantly reduce substantial data gaps and uncertainties (e.g., air-blood Pb relationship at low levels; sources contributing to current population blood Pb levels, especially in children; the relationship between Pb and childhood neurocognitive function at current population exposure levels; the relationship between ambient air Pb and outdoor dust and surface soil Pb concentrations). Further details on these and other research needs are provided in the consensus responses. The CASAC recommends that research be performed to address these data gaps and uncertainties to inform future Pb NAAQS reviews.

Based on this conclusion by CASAC, NACAA supports EPA's proposal to retain the current lead NAAQS at this time. Further, we endorse CASAC's recommendation that research should be undertaken to address the identified data gaps and uncertainties in order to inform future reviews of the lead standards.

On behalf of NACAA, we thank you again for the opportunity to provide comments on this proposal.

Sincerely,



George S. (Tad) Aburn, Jr.
(Maryland)
Co-Chair
NACAA Criteria Pollutants Committee



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