



STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

The Hon. David Vitter
United States Senate
516 Hart Senate office Building
Washington, DC 20510

Dear Senator Vitter:

I am writing to in response to your request to Michael Vince, President of the Association of Air Pollution Control Agencies (AAPCA), to provide input on the Environmental Protection Agency's forthcoming rule to lower the national ambient air quality standards for ozone. The Mississippi Department of Environmental Quality (MDEQ) shares EPA's goal of clean air and a healthy environment. However, we believe state and federal resources would be better spent focusing on implementing the current rules, rather than making them more stringent.

EPA recently promulgated several effective rules to reduce ambient ozone concentrations. In fact, the ozone concentrations are steadily declining nationally, and EPA's own projections and modeling predict even lower numbers by 2020. The proposed change would direct limited resources to a massive effort to revise State Implementation Plans, which could be redundant if the current standard results in a marked reduction in ozone concentrations.

The southeast region of the nation will be especially hit hard by a new standard because the ozone background values are much higher than the national average. Mississippi, like all southeastern states, has a large amount of naturally occurring sources of volatile organic compounds that contribute to ozone formation. These biogenic sources are a result of the agricultural and timber resources of our state.

In answer to your specific questions of AAPCA member states, we want to make the following additional points:

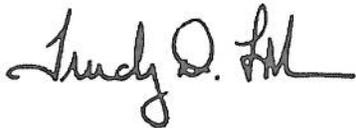
1. The CASAC process is not open and does not sufficiently consider all viewpoints. While they make the information available, it is primarily health-based and requires a health professional to fully analyze the data. There should be a multi-discipline review of the data and a projection of the real impact on citizens' daily lives and the total welfare of individuals and families, as well as their communities, especially in the more rural areas of the nation.
2. The CASAC and EPA have not considered the practical problems involved in lowering ambient concentrations of ozone in some areas beyond regional background levels. There are rural counties, such as Bolivar County in the Mississippi Delta, that have high design values for

Mississippi. However, there are few emissions sources, and in spite of research into wind patterns and other conditions, there are no identifiable sources. Rural counties could be faced with a mandate from EPA to change something that the local communities simply have no control over.

3. The CASAC maintains that they are only to consider the health effects, not the implementation issues, when setting the standard. However, the increased costs for utilities, fuel, food, and consumer goods that will accompany the implementation of a new, lower standard will likely reduce the standard of living for many families in Mississippi. In a state already facing economic hardship, the end result could be devastating.

We appreciate the opportunity to share our viewpoint. If you or your staff have any questions, please feel free to contact Maya Rao, Air Director for MDEQ, at 601-961-5242.

Sincerely,

A handwritten signature in black ink that reads "Trudy D. Fisher". The signature is written in a cursive style with a large, stylized "T" and "F".

Trudy D. Fisher

Executive Director

cc: The Honorable Thad Cochran
United States Senate

The Honorable Roger Wicker
United States Senate

Michael Vince, President
Association of Air Pollution Control Agencies