

**INTERNAL DELIBERATIVE DOCUMENT OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY
DISCLOSURE AUTHORIZED ONLY TO CONGRESS FOR OVERSIGHT PURPOSES**

EPA-3536

Phil Lorang/RTP/USEPA/US

03/13/2008 05:08 PM

To Karen Martin, Erika Sasser

cc

bcc

Subject I'm wondering if a pro-W126 sentence was inadvertently left
in the signature version of the ozone rule

Page 250 of the signature version now posted:

The W126 exposure index has long been recognized as a biologically meaningful and useful way to summarize hourly ozone data as a measure of ozone exposure to vegetation (Lefohn et al., 1989)". Similarly, Environmental Defense stated "[f]or reasons amply explained by CASAC and the Staff, neither the existing secondary standard for ozone nor the proposed primary standards are requisite to protect against adverse welfare effects on vegetation and forested ecosystems. CASAC and Staff further amply justified the need for a separate cumulative seasonal welfare standard to protect against these effects, rather than relying solely on the primary standards to provide such protection." The National Park Service (NPS) comment provided additional support to this view and more specifically stated that "the NPS supports both the conclusion that a seasonal, cumulative metric is needed to protect vegetation, and that the W126 is a more appropriate metric than the SUM06." EPA agrees with these comments for the reasons discussed above in sections IV.A.3 and IV.B.2.a).

Saying we agree with a comment that says a cumulative metric "is needed to protect vegetation" doesn't sound consistent with later statements in the preamble. Section IV.A.3 says it a little differently, conveying just that we agree it's a closer match to the true damage function.

Phil Lorang, Group Leader
Air Quality Analysis Group, AQAD, OAQPS, EPA
919 [REDACTED]