

- Therefore, it is recommended by the USDA-AAQTF, that given the inadequacies described in this document, at this time it would be inappropriate for EPA to establish a new secondary ozone standard that is different from the primary standard. AAQTF recommends that the primary and the secondary standards be the same.

- Further, EPA and USDA should initiate and provide support for scientists in academic institutions to conduct chamber-less studies under ambient field conditions to determine the spatial and temporal trends in the effects of ambient ozone on crop productivity. Data from such studies can be used effectively in setting scientifically defensible regulatory policies. Additionally, EPA should review the research data collected to determine if there is a more appropriate exposure metric for welfare effects and consider monitoring in rural areas using methods such as passive sampling.

- The USDA-AAQTF concluded, given the inadequacies of evidence used to support the establishment of a secondary ozone standard, that it is inappropriate for the EPA establish a new secondary standard that is different from the primary standard. AAQTF recommends that the primary and the secondary standards be the same.