What are the proposed updates to the National Ambient Air Quality Standards (NAAQS) for Particulate Matter?

On April 14, 2020, the EPA announced its proposal to retain the NAAQS for particulate matter (PM) without changes. This includes both fine (PM2.5) and coarse (PM10) particles. Particles are measured in micrograms per cubic meter (µg/m³). The EPA is required to review these standards every five years and to revise them, if appropriate, to provide the required protection for public health and welfare.

The current standards are as follows:

- PM2.5 – 12.0 µg/m³ (annual) and 35 µg/m³ (24-hour) (standards set in 2012)
- PM2.5 – 35 µg/m³ (24-hour) (standard set in 2006)
- PM10 – 150 µg/m³ (annual) (standard set in 1987)

The NAAQS are divided into primary and secondary standards. Primary standards are to protect human health and secondary standards protect the environment. The current secondary standards for particulate matter are identical to the primary standards, except for the annual PM2.5 secondary standard, which is set at 15.0 µg/m³.

At this time, the EPA Administrator believes that there are uncertainties in the evidence for adverse health effects below the current primary standards and in the potential public health impacts of reducing either ambient PM2.5 or PM10 concentrations below the current standards. For the secondary standards, the Administrator has concluded that the expanded evidence for non-ecological welfare effects is consistent with the last review and therefore proposes to retain the existing standards.

However, in its 2019 publication, “Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter, External Review Draft,” EPA staff scientists...
recommended lowering the annual particulate matter standard to 8-10 ug/m³, and estimates that such an action could save roughly 12,000 lives per year. The EPA’s Clean Air Science Advisory Committee was split on the issue, with some members recommending that the standards be tightened, and others saying the current standards are sufficient.

**What does this mean for Tribes and Air Quality/Air Management?**

The NTAA is concerned that maintaining the current standards may not be stringent enough to protect the most vulnerable members of society, including those with pre-existing health conditions like COPD, heart disease, asthma and diabetes, including many citizens of Indian Country, who have a higher occurrence of these conditions. Recent scientific evidence links air pollution to lethal outcomes from respiratory diseases such as COVID-19.

**Where can I find more information?**

This proposal was published in the Federal Register on April 30, 2020 and can be viewed at https://www.regulations.gov/document?D=EPA-HQ-OAR-2015-0072-0069. The deadline for comments is June 29, 2020.

Comments should be identified by Docket ID No. EPA-HQ-OAR-2015-0072 and may be submitted:

- **Online:** at https://www.regulations.gov/ follow the instructions for submitting comments to Docket ID No. EPA-HQ-OAR-2015-0072.
- **Please note that acceptance of hardcopy comments has been suspended due to the risk of transmission of COVID-19. Likewise, no hand deliveries will be accepted.**

The EPA will hold virtual public hearings on May 20 and 21, 2020, via teleconference. Two sessions will be held each of these two days. The first session will run from 9:00 AM (EST) to 1:00 PM (EST) on each of these days and the second will run from 3:00 PM (EST) to 7:00 PM (EST). Please be aware that the EPA may close a session 15 minutes after the last pre-registered speaker has testified if there are no additional speakers. Please see the webpage for more information at https://www.federalregister.gov/documents/2020/05/05/2020-09480/public-hearing-for-the-review-of-the-national-ambient-air-quality-standards-for-particulate-matter or contact Regina Chappell at (919) 541-3650 or at chappell.regina@epa.gov. The last day to pre-register to speak is May 14, 2020.

NTAA will be preparing a Policy Resource Kit for Tribes that will include an informational webinar and a template letter Tribes can use to submit comments. The PRK will be posted on NTAA’s website here: https://www.ntaatribalair.org/policy-resource-kits/

If you have further questions, please contact NTAA’s Project Director Andy Bessler at 928-523-0526 or at Andy.Bessler@nau.edu.