



August 28, 2012

Lisa Jackson, EPA Administrator  
Environmental Protection Agency  
Mail Code 6102T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OAR-2007-0492

Dear EPA Administrator Jackson,

Medical Advocates for Healthy Air, an initiative of Clean Air Carolina, a non-profit organization based in Charlotte, supports strong standards for fine particulate matter to protect the lives of millions of Americans. We are writing today in support of the Environmental Protection Agency's proposal to strengthen the annual standard for PM 2.5 and to urge the agency to adopt a more stringent 24-hour standard that adequately protects public health, as required by law.

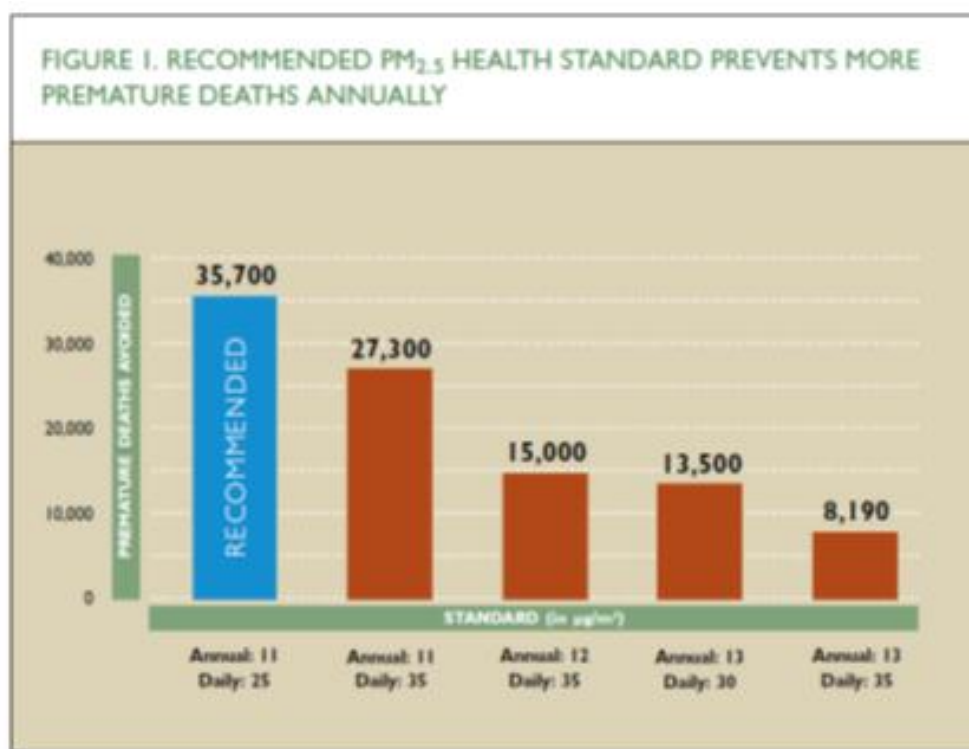
Medical Advocates for Healthy Air, a is a network of 300 medical and health professionals in North Carolina leading the call for cleaner, healthier air in our communities. We work in rural clinics, urban hospitals and medical offices across the state and see first-hand the growing impact ozone pollution, fine particulates and air toxins have on North Carolina residents. Our most vulnerable citizens face the highest risk from air pollution's harmful effects. Air quality standards must be strong enough to protect the 142,000+ children in our state with asthma and the thousands of others who suffer from lung disease, heart disease and diabetes.

Air quality must also be strong enough to meet the requirements by law. The Clean Air Act requires the EPA to follow science and set air quality standards to levels that protect public health with an adequate margin of safety. Unfortunately, we believe the proposed levels currently under consideration by the EPA are not strong enough. Fine particle air pollution can be deadly. An extensive body of scientific evidence shows exposure to particle pollution shortens human life and is linked to a variety of significant health problems such as heart attacks, strokes, respiratory illnesses and even cancer. Studies have also shown these effects occur at air pollution levels well below the current standards, proving the current standards are too weak and fail to adequately protect the public.

National medical and public health professional associations also stand behind stronger PM 2.5 standards. The American Thoracic Society, the American Academy of Pediatrics, the American Medical Association and the American Public Health Association have all called for more protective particulate matter standards.

**Medical Advocates for Healthy Air urges the EPA to adopt an annual standard of 11 micrograms per cubic meter (11 ug/m3). We also support a much stronger 24-hour standard of 25 micrograms per cubic meter (25 ug/m3).**

According to a recent report by the American Lung Association, Clean Air Task Force and Earthjustice entitled *Sick of Soot*, meeting these tightened standards could reduce harm to people with existing heart and respiratory diseases, and prevent 35,700 premature deaths annually. (See Figure 1) This will also result in significantly reduced healthcare expenditures in the form of illnesses, hospital visits, and days of lost productivity at an estimated \$281 billion every year.



On the North Carolina coast, a Titan Cement factory is planned for the town of Castle Hayne in New Hanover County. The cement kiln, mining, and diesel transportation of raw materials and product are expected to emit an additional 160 tons of PM 2.5 yearly to existing ambient levels of PM 2.5. The continuous PM 2.5 monitor presently located across the road from the proposed

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plant already exceeds PM 2.5 levels which the medical literature consider dangerous to human health, but which generally do not exceed the existing regulatory standards. Tighter standards will better reflect the public health risk in the surrounding community.

Charlotte, the largest city in North Carolina, is located in one of the fastest growing regions of the country. PM 2.5 levels have hovered just under the federal standard for the last ten years. But according to an article in the May, 2012 issue of the *Journal of the American Medical Association*, Charlotte's daily ambient PM 2.5 levels ranked second behind Los Angeles among the 20 US cities with large populations between June 2, 2008 and October 31, 2008. As the region grows, stronger federal standards will prompt local officials to take proactive steps to reduce sources of fine particulates.

Even short-term exposure to PM imposes significant health effects. The American Heart Association's Scientific Statement, *Particulate Matter Air Pollution and Cardiovascular Disease*, cited time-series studies showing that an estimate of 10-ug/m<sup>3</sup> increase in mean 24-hour PM 2.5 concentration increases the relative risk for daily cardiovascular mortality by approximately 0.4% to 1.0%. At present day levels, PM 2.5 poses an acute threat to sensitive populations with chronic disease and also to healthy children, childbearing women and the elderly. A 10-ug/m<sup>3</sup> increase during the preceding day contributes to the premature death of approximately one susceptible person per day in a region of five million people.<sup>1</sup> Finally, medical literature also indicates that apparently healthy young adults with unrecognized heart disease may be at risk during periods of heavy outdoor exercise in areas of elevated PM 2.5 exposure.

The EPA must act promptly and choose the most protective national air quality standards for fine particulate matter in the air we breathe. The current standards fail to protect the health of millions of Americans. All Americans deserve to breathe clean air and are counting on the EPA to protect them and their communities.

Sincerely,

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<sup>i</sup> Pope CA 3rd, Dockery DW. Health effects of fine particulate air pollution: lines that connect. *J Air Waste Manag Assoc*, 2006; 56:709–742.

Kung H-C, Hoyert DL, Xu J, Murphy SL. Deaths: Final Data for 2005. *National Vital Statistics Reports*. 2005; 561–121.