



# Allegheny County Council

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## Legislation Text

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Motion of the Council of Allegheny County urging the United States Environmental Protection Agency to revise its standard for annual average fine particulate matter exposure from 12 micrograms per cubic meter to 9-10 micrograms per cubic meter.

**WHEREAS**, the United States Environmental Protection Agency (EPA) promulgates regulations governing national ambient air quality standards (NAAQS); and

**WHEREAS**, part of the NAAQS standards govern standards for individuals' exposure to fine particulate matter, having a diameter of less than or equal to 2.5 microns (also known as PM 2.5); and

**WHEREAS**, the current NAAQS standard for annual PM 2.5 exposure of 12 micrograms per cubic meter was established in 2012, and was based on research that was largely concluded in 2010 (*see* Samet JM, Clean Air Scientific Advisory Committee. Letter to Hon. Lisa P. Jackson, administrator, Environmental Protection Agency, re: CASAC review of Policy assessment for the review of the PM NAAQS - second external review draft (June 2010): EPA-CASAC-10-015. Washington, DC: September 10, 2010); and

**WHEREAS**, as of 2010, available epidemiologic evidence, supported by toxicologic evidence and a risk assessment conducted by EPA staff, indicated that annual exposure to PM<sub>2.5</sub> caused premature death at ambient concentrations as low as 11 micrograms per cubic meter per year (*see, e.g.*, Policy assessment for the review of the National Ambient Air Quality Standards for particulate matter: EPA-452/R-20-002. Research Triangle Park, NC: Environmental Protection Agency, January 2020); and

**WHEREAS**, in October of 2019, the EPA Clean Air Scientific Advisory Committee Particulate Matter (PM) Review Panel concluded “that the current PM<sub>2.5</sub> standards are insufficient to protect public health, on the basis of a review of the scientific evidence from epidemiologic studies, toxicologic studies in animals, and controlled human exposure studies; this evidence is consistent within each discipline and coherent among the multiple disciplines in supporting a causal, biologically plausible relationship between ambient concentrations well below the current PM<sub>2.5</sub> standards and adverse health effects, including premature death,” (*see* The New England Journal of Medicine, “The Need for a Tighter Particulate-Matter Air-Quality Standard” August 13, 2020); and

**WHEREAS**, also according to the New England Journal of Medicine article, this same Panel “unequivocally and unanimously concluded that the current PM<sub>2.5</sub> standards do not adequately protect public health. An annual standard between 10 µg per cubic meter and 8 µg per cubic meter would protect the general public and at-risk groups. However, even at the lower end of the range, risk is not reduced to zero. The margin of safety increases as the level of the standard is lowered within this range.”; and

**WHEREAS**, as noted by the Wisconsin Department of Natural Resources, “[b]oth inhalable coarse and fine particles pose health risks because they can bypass the body's natural defense mechanisms and affect both the lungs and heart. Scientific studies have linked particle pollution exposure to a variety of health problems, including:

- increased coughing or difficulty breathing;
- reduced lung capacity and function;
- aggravated asthma;
- chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks; and
- premature death in people with heart or lung disease”; and

**WHEREAS**, as also noted by the Wisconsin DNR, “[p]eople with heart or lung diseases, children and older adults are the most likely to be affected by particle pollution exposure. Even if you are healthy, you may experience temporary symptoms from exposure to elevated levels of particle pollution.”; and

**WHEREAS**, on February 28, 2023, the Council’s Committee on Health and Human Services received testimony from Matthew Mehalik, Adjunct Professor of Environmental Policy at Heinz College, School of Public Policy and Management at Carnegie Mellon University, indicating that, while prior strengthening of the NAAQS PM 2.5 standards have been effective in creating some improvement in air quality in the Greater Pittsburgh region, further steps are necessary to adequately protect the public health in Allegheny County; and

**WHEREAS**, on February 27, 2023, the EPA published notice of a proposed revision to the NAAQS PM 2.5 standard, under which the annual exposure standard would be reduced from 12 micrograms per cubic meter per year to nine to 10 micrograms per cubic meter per year

**WHEREAS**, on the basis of scientific data derived since 2010 and credible, undisputed testimony offered to Council, and also considering the significant health risks posed by fine particulate matter and the 2019 recommendations of the members of the EPA Clean Air Scientific Advisory Committee Particulate Matter Review Panel, it is the considered judgment of Council that additional strengthening of the NAAQS PM 2.5 standards is both practicable and necessary to protect the public from significant health risks;

**NOW THEREFORE, IT IS MOVED, BY THE COUNCIL OF ALLEGHENY COUNTY, THAT**

The United States Environmental Protection Agency is hereby urged to revise its standard for annual average fine particulate matter exposure from 12 micrograms per cubic meter to 9-10 micrograms per cubic meter

**COUNCIL HEREBY FURTHER MOVES THAT:**

A copy of this Motion shall be provided as a comment to the United States Environmental Protection Agency’s proposed NAAQS PM 2.5 annual exposure standard rulemaking, at Docket ID No. EPA-HQ-OAR-2015-0072.