



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

100 Cambridge Street Suite 900 Boston, MA 02114 • 617-292-5500

Maura T. Healey  
Governor

Kimberley Driscoll  
Lieutenant Governor

Rebecca L. Tepper  
Secretary

Bonnie Heiple  
Commissioner

**RESPONSE TO COMMENTS  
ON PROPOSED AMENDMENTS TO  
310 CMR 7.00  
Air Pollution Control  
And  
310 CMR 6.00  
Ambient Air Quality Standards for the  
Commonwealth of Massachusetts**

**September 26, 2025**

**REGULATORY AUTHORITY:**  
M.G.L. c. 21A, §§ 2 and 8  
M.G.L. c. 111, §§ 2C and 142A through 142D

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.  
TTY# MassRelay Service 1-800-439-2370  
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## Response to Comments

On March 28, 2025, the Massachusetts Department of Environmental Protection (MassDEP) proposed amendments to 310 CMR 7.00 *Air Pollution Control* and 310 CMR 6.00 *Ambient Air Quality Standards for the Commonwealth of Massachusetts* that would adopt the revised primary annual fine particulate matter (PM<sub>2.5</sub>) National Ambient Air Quality Standard (NAAQS) of 9 micrograms per cubic meter (µg/m<sup>3</sup>) promulgated by the U.S. Environmental Protection Agency (EPA) on February 7, 2024, and would adopt the revised secondary annual sulfur dioxide (SO<sub>2</sub>) NAAQS of 10 parts per billion (ppb) promulgated by EPA on December 10, 2024. In accordance with M.G.L. Chapter 30A, MassDEP held two public hearings on the proposed amendments on April 29, 2025 (10:00 am and 6:00 pm) and accepted public comments until May 9, 2025.

MassDEP received a joint comment in support of the amendments from Conservation Law Foundation (CLF), Alternatives for Community & Environmental (ACE), Unitarian Universalist Mass Action, GreenRoots, and Arise for Social Justice. MassDEP has summarized and responded to the comment below. MassDEP did not make any changes to the final regulations based on comments received.

**Comments:** Conservation Law Foundation (“CLF”) and partner organizations with the Environmental Justice (“EJ”) Table are in strong support of the proposed amendments. There is robust science that underlies the federal NAAQS, as adopting the lower standards result in immense health benefits, in particular, the health of EJ communities who are consistently burdened with the highest exposure to air pollution through a combination of historic and modern unjust transportation planning practices.

In its reconsideration of the PM<sub>2.5</sub> NAAQS, EPA built on the evidence of the 2019 ISA, undertaking a carefully targeted approach to consider the latest available data relevant to protecting public health and the environment. This reconsideration led to the recommendation and adoption of a primary standard of 9 µg/m<sup>3</sup>. MassDEP should take action to ensure that the latest science continues to be reflected in Massachusetts’ regulations.

Although MassDEP is currently doing what it must—updating standards to meet “minimum federal standards,” we recommend that Massachusetts continue to set, meet, and exceed higher standards for air pollution regulation, specifically for ultrafine particulates and some of the most common transportation-related pollutants. MassDEP should consider strengthening the standards for other pollutants to address the serious degradation of air quality, including additional actions for currently unregulated pollutants. Unlike its larger particulate matter equivalents, ultrafine particulates are not regulated in the NAAQS, 42 U.S. Code § 7408, despite their severe public health and environmental risks. MassDEP should consider whether it might monitor for these harmful pollutants in the future, despite what changes may occur at the federal level.

While environmental pollution threatens us all, EJ populations are especially affected by air quality problems. As climate change leads to temperature rise, rates of asthma and respiratory disease will increase dramatically in neighborhoods throughout the Commonwealth who are already grappling with high levels of air pollution. Already, one in five children in the United States has asthma because of car exhaust. Those children with asthma are disproportionately of color and tend to live closer to highways. At a time when the federal government seeks to erase

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science, lived experience, and EJ communities, Massachusetts must continue to lead and protect its communities. MassDEP should continue to work to reduce harmful air pollution throughout the Commonwealth.

**Response:** MassDEP appreciates the comments and has finalized the regulations as proposed. MassDEP notes that it continues to take actions to better understand how air pollution affects EJ populations. In 2024, MassDEP added four ultrafine particulate matter monitors at its monitoring stations in Chelmsford, Boston-Chinatown, Boston-Roxbury, and Springfield to enhance ambient air monitoring in and near urban EJ populations near high traffic roadways. MassDEP also implemented a second round of its air sensor grant program to provide tribal organizations, non-profit organizations, community-based organizations, and municipalities up to ten “PurpleAir” sensors to measure PM<sub>2.5</sub> levels in their local communities. This year MassDEP added two new monitoring stations in EJ population areas - a PM<sub>2.5</sub> and black carbon monitoring station in Framingham and a PM<sub>2.5</sub>, PM<sub>10</sub>, and black carbon monitoring station in Saugus. In addition, MassDEP is in the process of developing approaches and tools to better characterize vehicle emissions in EJ communities as part of its cumulative impact analysis efforts.