

## ***COARSE PARTICULATE MATTER COALITION***

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August 17, 2010

Dr. Jonathan M. Samet  
Chairman  
Clean Air Scientific Advisory Committee  
EPA Science Advisory Board (1400F)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW.  
Washington, DC 20460

Re: Draft CASAC Letter on Second Draft PM Policy Assessment

Dear Dr. Samet:

Attached for review by the Committee are comments filed yesterday on behalf of our Coalition by Dr. John Richards. They are similar in some respects to the Comments he submitted to the Committee at the meeting in July. However, Section 1 of these Comments presents a new analysis, based on AQ data submitted recently by our members, of the effects of a PM10 standard in the range of 65-85 micrograms per cubic meter with the 98th percentile form.

Dr. Richards' analysis indicates that a standard of 85 would be significantly more stringent than the current standard in the West and Midwest, largely as a result of rural/crustal dust emissions, and would often be exceeded by background concentrations. In the East and South, where urban dusts are more heavily represented, his analysis indicates that such a standard would be less stringent than the current standard.

We are in the process of reviewing the Committee's draft letter on the second draft PA, to be discussed in the August 25 teleconference, recommending that EPA consider a PM10 standard in the range of 65-75 with the 98 percentile form. This recommendation is based expressly on the analysis in the draft PA concluding that a standard of 85 with the 98th percentile form would be generally equivalent to the current standard.

Dr. Richards' analysis indicates that such a standard is not the equivalent of the current standard, and would have the perverse effect of increased stringency in controlling rural/crustal emissions in the West and less stringency in control of Eastern/urban dusts. This result directly contradicts the basis in the draft PA for the Committee's recommendation in the current draft letter.

We ask the Committee to reconsider its recommendation in the draft letter in view of this new information. If you have questions or would like to discuss these issues in more detail we would be glad to arrange a conference call to do so. We are trying to arrange for Dr. Richards to be available during the public comment portion of the August 25 call but have not yet been able to confirm that.

Sincerely,

Kurt E. Blase

*Counsel for the Coarse PM Coalition*