

05-22-16 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Particulate Matter Panel. These preliminary pre-meeting comments are from individual members of the Panel and do not represent CASAC consensus comments nor EPA policy. Do not cite or quote.

**Preliminary Comments from Dr. John Balmes on
EPA's Integrated Review Plan for the National Ambient Air Quality Standards
for Particulate Matter (External Review Draft – April 2016)
05-22-16**

Comments on Chapter 3 (Science Assessment):

To what extent does Chapter 3 clearly and adequately describe the scope, specific issues to be considered, and organization of the ISA?

Overall, I think that Chapter 3 is well-conceived and well-written.

What are the panel's views on the overall scope of the ISA? Does the planned scope ensure that the EPA will capture the scientific literature most pertinent to the ISA's focus, which is answering the question, "Is there an independent effect of PM on health and welfare at relevant ambient concentrations?"

The planned scope of the ISA is sufficiently broad to ensure that the EPA will capture the scientific literature necessary to address the effect of PM on health and welfare. My major concern is that the proposed scope may be overly broad and ambitious. I applauded the agency's move to more focused ISAs in lieu of encyclopedic Criteria Documents. That said, in my view the SO_x ISA was not as well focused as it could have been. I fear that given the much greater size of the literature on PM an even less well-focused ISA will result. I urge the agency to remain committed to integration and synthesis in the preparation of the PM ISA.

What are the panel's views on the approaches outlined in Chapter 3 to streamline the discussion in some sections of the ISA? What are the panel's views on EPA's plans to produce an assessment that is concise and forms an adequate scientific foundation for subsequent steps of the NAAQS review process?

As my comments above make clear, I am 100% in support of efforts to streamline discussion and produce an adequate, but concise foundation for the PM NAAQS review process.