

PM Policy Assessment (PA) - 1st Draft

M. Lippmann Review Comments

General Comments:

I commend OAQPS Staff for creating a straightforward text that clearly describes the objectives and methods used to develop policy assessments (PAs) for the PM_{2.5}-associated health and welfare effects that were judged, in the PM ISA 2nd draft, to be either causally or likely to be causally related to the exposures. While the applications of the methods to define the quantitative aspects of the risk assessments (RAs) for short- and long-term exposures remains incomplete at this point in time, the careful approach to their generation bodes well for the successful completion of the RAs and, subsequently, of the PAs in reasonable and well justified forms.

I am impressed with the progress that has been made in the development, refinement, and applications of the RA and PA methodologies. I believe that the process choices that were made in the design of both first draft documents, in terms of monitoring data and the choices of concentration-response functions were reasonable and appropriate.

As a long-term observer of the development of NAAQS, I am gratified that the EPA Administrator has decided to have CASAC review a preliminary draft of its Policy Assessment in order for CASAC to better fulfill its mandated role in reviewing and commenting on NAAQS. This procedural change should avoid the unfortunate necessity of the previous round of PM NAAQS review, when CASAC felt obliged to disagree with Agency policy conclusions after they were already made public.

With specific regard to the PA draft of September 2009, I wonder if it needed to have so much text devoted to the re-iteration of the contents of the ISA and RA drafts. A much shorter PA text with references to the supporting studies cited in the ISA and/or the RA would be preferable.

I did find a few nits to pick on the PA draft, and these are described below under Specific Comments.

Specific Comments:

Page(s)	Line(s)	Comment
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2-4	21	Change “diffuse to” to “deposit on”.
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2-46	12,13	There is substantial seasonal variation of nickel in ambient air in New York City, at least in New York City where residual oil is widely used for space heating in large residential and commercial buildings (Peltier et al.
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2009). There is also a strong seasonal variation in sulfuric acid in the eastern part of the U.S.

3-41 13-15 There have been several studies demonstrating associations “between long-term PM exposure and longitudinal change in subclinical markers of atherosclerosis” in ApoE^{-/-} mice, as discussed in the PM ISA.

3-47 4 Change “OC” to “CO”.

3-54 14 Delete “likely”.

3-56 1 Change “PM2.5” to “PM_{2.5}”.

3-58 15 Change “NA+” to “Na+”).

3-81 13,17 Delete “R”.

3-84 5 Note that the “systematic attribution” statement is applicable to pollutant vapors, as discussed later in Section 3.4.6.

3-85 27 This statement also applies to UFP.

3-91 11 Delete “other”.

3-92 24 Change “SO₄” to “ and Al”.

3-94 16, 17 Subscript the numbers

3-97 23 wrong font

3-105 14 Which NHANES?

6-9 12 “dv”, i.e., deciview, was not previously defined in the text.