

03-27-19 Preliminary Draft Comments on the 03-07-19 Draft CASAC PM ISA Report.

These preliminary pre-meeting comments are from individual members of the CASAC to assist in meeting deliberations and do not represent CASAC consensus comments nor EPA policy.

-Do Not Cite or Quote-

03-27-19 Preliminary Comments from Dr. Steven Packham

Here are some additional thoughts/comments relating to the Draft Report:

Individuals submitting public comments on the Draft Report want National Ambient Air Quality Standards that protect public health and the environment. Based on CASAC member draft comments, it would be unthinkable to suggest that any member of the CASAC would not want the same.

The Draft Report does list deficiencies in the draft PM ISA. Addressing these deficiencies may be seen by some as either unnecessary; or worse, an impediment to more protective standards. Such assumptions are inconsistent with what the EPA, the CASAC and the public can reasonably be assumed to want and they collectively suggest a false adversarial premise for the CASAC's desired collaborative approach to strengthen the integration of scientific evidence from epidemiology and biological studies in a final PM ISA.

It is with appreciation of more protective PM standards promulgated since 1997 and the contributions of the CASAC advisory panels in their review processes that I find myself recommending that deficiencies in the draft PM ISA mentioned in the Draft Report be addressed to support and advance the progress that has heretofore been made. Specifically, future PM standards can be even more protective of the environment and health if the EPA elects to acknowledge and address the issues presented in the Draft Report. Most notably from the standpoint of toxicology:

- 1) The lack of a comprehensive review of the scientific biological literature; and
- 2) The lack of following the standard scientific method of formulating and testing causal hypotheses based on data and evidence from human biological studies.

The inclusion of a broader scope of extant biological data and the testing of hypothetical pathways leading to adverse health outcomes presented in the draft ISA is more likely to confirm rather than disprove several of its inferred causal determinations.

In conclusion, it is my hope that we can move forward with a resolve to acknowledge the indispensable value of previous review cycle documents, processes, and precedents and to accept in principle the Draft Report's intent to support, rather than question, challenge, or discredit, and that the CASAC members and chairman finalize the Draft Report with editing to optimize its value to the EPA.