

Good afternoon. My name is Kate Pawasarat, and I am the Engineering and Science Fellow at the Washington University Interdisciplinary Environmental Clinic. I would like to read the following comments on behalf of the Missouri Coalition for the Environment and Leslie and Jack Warden, clients of the Clinic, regarding the Lead NAAQS Proposed Rule.

**First, the standard should protect public health with an adequate margin of safety.**

Lead is now known to cause negative health effects even at very low exposure levels, particularly among children. Properly evaluating public health impacts is a critical component of setting the lead standard. CASAC has stated that “a population loss of 1-2 IQ points is highly significant from a public health perspective” and that the standard should “be set to protect 99.5% of the population from exceeding that IQ loss.”

However, in the Proposed Rule, EPA applies the 1-2 point IQ loss range to the population mean rather than the 99.5<sup>th</sup> percentile. EPA’s proposal lacks the margin of safety and level of protection provided by the CASAC recommendations. The potential public health impacts of EPA’s proposal, particularly for susceptible subpopulations, is concerning.

**Second, the Lead NAAQS is a science-based standard.**

We appreciate the efforts of the CASAC Lead Panel and its involvement in the review of the lead NAAQS. Throughout this process, CASAC has provided valuable input to ensure that the documents generated during the lead NAAQS review reflect the current scientific evidence and available data on lead exposure and risk. Based on this information, CASAC has repeatedly recommended a lead NAAQS level no higher than 0.2 micrograms per cubic meter as a monthly average. This is consistent with recommendations made by EPA Staff.

However, the Proposed Rule indicates that EPA is considering lead NAAQS levels as high as 0.3 ug/m<sup>3</sup>. In addition, EPA has invited comments on levels up to 0.5 ug/m<sup>3</sup>, over twice the level recommended by CASAC and EPA Staff.

We support the work of CASAC as it continues to provide strong recommendations for an appropriate science-based standard. We urge EPA to follow the recommendations of its own staff and CASAC so that the lead NAAQS reflects the current scientific evidence and protects public health with an adequate margin of safety.