

04-16-18 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Sulfur Oxides 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 Do not cite or quote.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. Frank Speizer on the
03-29-18 Draft CASAC Review of the EPA’s *Policy Assessment for the Review of the Primary National Ambient Air Quality Standard for Sulfur Oxides (External Review Draft - August 2017)***

On the 3rd page of the Letter to the Administrator, lines 22-31:

“The subpopulation upon which the health effect evidence is based are adults with mild to moderate asthma. However, the CASAC notes that there are many susceptible subpopulations that have not been studied and which could plausibly be more affected by SO₂ exposures than adults with mild to moderate asthma. It is possible that the current 75 ppb level may not provide an adequate margin of safety in these groups. However, because there is considerable uncertainty in quantifying the sizes of these higher risk subpopulations and the effect of SO₂ on them, the CASAC does not recommend reconsideration of the level at this time. However the CASAC strongly recommends that future assessments better quantify the numbers of individuals expected to be affected at the current (or proposed alternative) standard in these groups so that a more informed judgment about the margin of safety in high risk subgroups can be made.”

I think we could be a little stronger here, however, we may be getting ourselves into an inconsistent position. If we believe that there is a subpopulation of 10,000-20,000 children under age 15 who will be hospitalized or visit emergency rooms from exposures resulting from the current standard how can we say the current standard meets the criteria of “with an adequate margin of safety”? Since the further assessments have simply not been done (although recommended) I think we have to say something more definitive about there being a population remaining at risk. At the very least the “may” in line 25 should be changed to “does”:

“It is possible that the current 75 ppb level does not provide an adequate margin of safety in these groups.”