

05-04-11 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Lead Review 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 Do not cite or quote.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. Deborah Cory-Slechta

Chapter 3 Key Policy-Relevant Issues

The EPA staff is to be commended for its generally thorough coverage of the Review Plan covered in the various chapters of the document and intent to leverage the new review on both the past experience as well as updated information since that time.

Key to the policy-relevant issues is the assessment of the adverse consequences of lead in a multimedia context. The derivation of a NAQQS for lead in air in the absence of this recognition would never achieve the stated purpose of deriving such values. The structuring of EPA offices largely based on legislative requirements can to some extent lead to such artificial distinctions.

Although explicitly stated in the issues related to the Secondary NAAQS, the issue of recognition of multimedia, multipathway is not stated for the primary NAAQS policy relevant issues.

In accord with new and concerted efforts within the Agency, it would seem that cumulative risks as related to lead exposure should be a policy-relevant consideration. While cumulative risk can be considered in different contexts, in the Primary NAAQS, this would include the potential for either enhanced effects of lead, or for lead effects to be present at lower levels of exposure, when such lead exposures occur in the presence of other environmental/occupational exposures, and/or in combination with other risk factors for human diseases and disorders (underlying comorbidities, stress, nutritional insufficiencies or deficiencies, etc.), where such data are available.