

## **COARSE PARTICULATE MATTER COALITION**

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March 21, 2019

Dr. Louis A. ("Tony") Cox, Jr.  
Chairman  
Clean Air Scientific Advisory Committee  
EPA Science Advisory Board Staff Office(1400R)  
U.S. Environmental Protection  
Agency, 1200 Pennsylvania Avenue  
NW, Washington, DC 20460;

*Submitted electronically through SAB staff*

Re: Clean Air Scientific Advisory Committee Draft Report  
(03/07/19) to Assist Meeting Deliberations

Dear Chairman Cox and Committee Members:

The Coarse Particulate Matter Coalition (CPMC), an organization of industries dedicated to scientifically sound regulation of coarse particulate matter (PM10-2.5) in air, offers the following comments on the Clean Air Scientific Advisory Committee (CASAC) Draft Report on the First External Review Draft of EPA's Integrated Science Assessment (ISA) for Particulate Matter.<sup>1</sup>

In general, the Coalition supports the draft Report as an accurate reflection of the views expressed by the Committee at the December 2018 meeting to review the first draft PM ISA. However, we urge the Committee to adopt the following change to the sentence at the beginning of the second full paragraph of the draft:

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<sup>1</sup> Current members of the Coalition include the Corn Refiners Association, National Cotton Council, National Stone, Sand & Gravel Association, Rio Tinto Kennecott and the National Cattlemens' Beef Association.

Overall, the CASAC finds that the Draft ISA does not provide a comprehensive or systematic assessment of the available science relevant to understanding the health impacts of exposure to ~~fine~~ particulate matter, nor does it follow widely accepted scientific methods for deriving sound, independently verifiable, scientific conclusions from available data.

We are suggesting elimination of “fine” from this sentence, rendering it applicable to other PM fractions studied in the ISA. Our suggestion is intended to reflect the Committee’s apparent conclusion at the December meeting that the flaws in the ISA causality analyses are not limited to fine PM but extend to the coarse fraction as well. These are outlined in our letter to the Committee of December 5, 2018 and our testimony at the Committee meeting, and are discussed in more detail in our comments to EPA staff, which we provided to the Committee on December 11, 2018. Similar points are made in the individual views of Dr. Lange attached to the draft Report.<sup>2</sup>

We understand that the bulk of the draft ISA is devoted to fine PM, and the Committee’s focus on the flaws in the fine PM analyses is certainly justified. However, the Committee’s Report should make it clear that similar flaws extend to the analyses of the coarse fraction as well, and that all should be corrected in the next draft of the ISA. We believe the small change we have suggested above would be sufficient to accomplish this task. We thank you for considering our comments on the Committee’s draft Report.

Respectfully submitted,

Kurt E. Blase

Counsel for the Coarse PM Coalition

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<sup>2</sup> See, e.g., pp. A-137 (long term cardiovascular effects); A-140 (long term metabolic); A-144 (short term nervous system); A-153 (cancer); A-160-161 (long and short term mortality).