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March 29, 2008

Individual Comments following the March 25, 2008 Teleconference Consultation by the Clean Air Scientific Advisory Committee (CASAC) CASAC Ambient Air Monitoring and Methods (AAMM) Subcommittee regarding Ambient Air Monitoring Issues related to the National Ambient Air Quality Standards (NAAQS) for Lead (Pb)

As indicated during earlier consultations after review of plans for formulation and implementation of the NAAQS for lead, several colleagues on the CASAC Lead Review Panel are much better prepared than I am by experience and scientific expertise to provide constructive comments on air quality monitoring methods that are appropriate for airborne lead.

Thus, my natural predilection as a member of CASAC is to focus on general rather than specific aspects of the challenges involved including:

1) The importance and apparent lack of timeliness in implementation of some of EPA's responsibilities for joining with other agencies of our federal and state governments in decreasing airborne lead pollution in our country; and,

2) The very substantial and remarkably positive responsiveness of staff in EPA's Office of Air Quality Planning and Standards to the several recommendations by CASAC with regard to implementation of future primary and secondary NAAQS standards for airborne Pb pollution including:

   a) Switching from the current "Indicator" of airborne lead pollution [Pb in Total Suspended Particulate Matter (TSP)] to Pb in PM_{10}, and

   b) Decreasing the air concentrations of Pb that would be allowed under very substantially more stringent NAAQS standards that appear to be necessary to protect public health and public welfare from adverse effects of airborne Pb in the future.

Importance and Apparent Insufficiency of Past Efforts:

What an inspiration it was to learn that several different agencies of our Federal government had committed themselves during the early 1990s to establishing a very worthy goal for environmental protection — "eliminating childhood lead poisoning [in the United States] by the year 2010!"

Prohibiting the use of Pb additives in gasoline and Pb-based pigments in house paints were very substantial steps forward toward this noble goal.

But what a disappointment it has been also to recognize that these two major steps forward have not been adequate to prevent the continuing adverse effects of airborne Pb on the IQ of children in American society.

The attached reference indicates that the currently proposed actions and reports regarding lead pollution and resulting childhood lead poisoning in the United States are long overdue.

> Childhood lead poisoning prevention. Too little, too late. B P Lanphear. J Amer Med Assn. 2005 May, 293(18):2274-2276.

I commend the present administration of the USEPA for undertaking their apparently renewed interest and actions with regard to lead pollution and lead poisoning and hope that the USEPA will now do an even larger share of its important part -- together with other agencies of government – and thus help our country make further progress toward achieving this very worthy national goal -- if not by the year 2010 -- then as soon thereafter as possible!

Responsiveness of OAQPS Staff to Recommendations by CASAC's Lead NAAQS Review Panel

During the recent CASAC Ambient Air Monitoring and Methods Subcommittee, Consultation, this Subcommittee was asked to review four important reports by staff within EPA Office of Air Quality Planning and Standards:

1) "Options for Lead NAAQS Indicator: Monitoring Implications" by Kevin Cavender.
2) "Draft Federal Reference Method (FRM) and Federal Equivalent Method (FEM Criteria for Lead in PM 10 (Pb-PM10" by Joann Rice.
3) "Lead NAAQS Ambient Air Monitoring Network: Network Design Options Under Consideration" by Kevin Cavender.
4) "Lead NAAQS Ambient Air Monitoring Network: Sampling Frequency Options Under Consideration" by Mike Papp.

What a pleasure it was to see how very thoroughly each of these four reports gave earnest attention to the several recommendations of the CASAC Lead Review Panel in their earlier letter reports to the Administer of EPA with regard to options for lead NAAQS indicator, federal reference and federal equivalence methods of analysis, and both network design and sampling frequency options under consideration!

The authors of each of these reports are to be commended for the thoroughness and clarity with which their analyses and recommendations have been completed and presented for evaluation by our CASAC Ambient Air Monitoring Subcommittee.

We hope this kind of thorough and positive responsiveness will be followed by similar consideration of CASACs other recommendations during the progress that must be made by the USEPA in meeting the court-ordered deadlines for presentation of the:

Proposed Rule for lead NAAQS on May 1, 2008, and the

Final Rule for lead NAAQS on September 1, 2008 -- both of which are now less than two months away, and less than six months away, from the date of this Ambient Air Monitoring and Methods Subcommittee Consultation on March 25, 2008.