



Review of the Particulate Matter National Ambient Air Quality Standards

Schedule and Development of Policy Assessment

Presentation for CASAC PM Panel

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October 5, 2009



Schedule

- EPA Administrator Lisa Jackson wants to accelerate schedule for PM NAAQS review to respond to court remand, consistent with the use of good science
 - Recognizes importance of issues raised by the court:
 - Failure to explain adequately why final decisions differed from CASAC's recommendations
 - Failure to explain adequately why primary annual standard is sufficient to protect public health with an adequate margin of safety
 - Decision to set secondary standards identical to primary standards was unreasonable and contrary to the law
 - Desires to provide important public health protections as soon as possible



Commitment to Good Science

- EPA Administrator is committed to full consideration of best available science in all assessments

"Science is one of the key factors that the President asked us to focus on when shaping our environmental agenda. Our decisions have to be guided by the most thorough research, the most accurate data, and the strongest evidence."

- Under an accelerated schedule:
 - Schedule for Integrated Science Assessment (ISA) is unchanged
 - Schedule for assessment documents would be accelerated by having CASAC review/public comment on current external review drafts only
 - Public comment period extended until Nov 9, 2009
 - Schedule for Policy Assessment (PA) includes discussion on preliminary draft and CASAC review/public comment on 1 external review draft



Policy Assessment

- Administrator Jackson reinstated Policy Assessment document ("Staff Paper") in lieu of issuing policy assessment as an Advanced Notice of Proposed Rulemaking (ANPR) – May 21, 2009
 - Transparent staff analysis of scientific basis for alternative policy options
 - Integrates and interprets information from ISA and REA to "bridge the gap" between the scientific assessments and judgments required of Administrator in determining whether to retain or revise the NAAQS
 - Facilitates CASAC advice to EPA and recommendations to Administrator on any new standards or revisions to existing standards as may be appropriate
 - CASAC review and public comment on draft Policy Assessment



Target Dates for Accelerated Schedule

- Final ISA – December 2009
- Final Risk Assessment and Urban-Focused Visibility Assessment – December 2009
- External Review Draft Policy Assessment (PA) – December 2009
 - Will include draft staff conclusions for elements of the primary and secondary standards based on the evidence/quantitative analyses
- CASAC review of External Review Draft PA – January 2010
 - Would provide opportunity for CASAC comment on final RA and UFVA
- Final PA – February 2010
 - Will include final staff conclusions
- Proposed rule – July 2010
- Final rule – April 2011



Preliminary Draft Policy Assessment – Sept 2009

- Modeled after 2005 PM Staff Paper
- Released for informational purposes only and to facilitate discussion with CASAC on:
 - Overall structure
 - Areas of focus
 - Level of detail
- Contains 4 early draft chapters (**bolded**); outlines for 3 additional chapters
 - **Chapter 1 – Introduction; Background**
 - **Chapter 2 – Characterization of Ambient PM**
 - **Chapter 3 – Policy-Relevant Assessment of Health Effects Evidence**
 - Chapter 4 – Characterization of Health Risks
 - Chapter 5 – Staff Conclusions on Primary PM Standards
 - **Chapter 6 – Policy-Relevant Assessment of Welfare Effects Evidence**
 - Chapter 7 – Staff Conclusions on Secondary PM Standards



Additional Work Planned for External Review Draft Policy Assessment

- Preliminary draft is clearly a work-in-progress
- Identify and potentially adapt ISA figures to sharpen focus and discussion of health effects evidence in Chapter 3
- Consider restructuring Chapters 6 and 7 into separate discussion of qualitative welfare effects evidence and quantitative analyses
- Continue joint NCEA/OAQPS efforts to obtain relevant air quality data from epidemiologic study authors to inform evidence-based considerations
- Consider CASAC review and public comment on second draft ISA and draft risk/visibility assessment documents to focus presentation of scientific evidence and quantitative analyses



Additional Work Planned for External Review Draft Policy Assessment (cont.)

- Synthesize entire breadth of evidence as well as results from quantitative assessments to inform basis for considering alternative standards
- Develop staff conclusions for basic elements of the primary and secondary standards based on the evidence/quantitative analyses
 - Indicators
 - Averaging times
 - Ranges of levels
 - Form
- Present options for Administrator to consider in reaching decisions on suite of PM standards to propose