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December 3, 2018

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Subject: Public Comment on Dismissal of the Particulate Matter Advisory Panel and its consolidation under the Clean Air Science Advisory Committee (CASAC)

To Whom it May Concern,

I am writing to indicate my strong disagreement with the recent action by the EPA to dismiss the Particulate Matter Advisory Panel that was previously convened by the Clean Air Science Advisory Committee (CASAC). As a researcher and teacher who spends much of my time and energy studying and educating about sources, transformations and impacts of atmospheric particulate matter (PM) and other air pollutants, I write to emphasize the complexity and vital importance of understanding this critical atmospheric contaminant. The Integrated Science Assessment (ISA) is a massive collation of the best scientific research from around the world on this pollutant, and the EPA is bound under statute to carefully review this evidence when setting standards. This evidence points out the fact that even low levels of exposure to PM leads to health damages, and that the current standard may be 'missing' much of the culprit by not addressing lower level exposures to PM and to ultrafine particles.

With all due respect for the expertise and dedication of the chartered CASAC committee tasked with this review, it is painfully clear to anyone who is familiar with this literature that the time frame and set of expertise committed to this process falls well short of what is required to give the ISA a thorough review and properly advise the rule-setting process, which CASAC is required to do. Even were the most qualified seven people tasked with this review, it would be a struggle under the given time frame. And based on my familiarity with this research community, I don't believe the best people have been selected. The lack of a trained epidemiologist on CASAC is a particularly glaring omission, as this research community has been central to our understanding of the hazards associated with air pollution from the beginning. Epidemiologists have also been key in providing evidence of the massive improvements that have taken place in our nation's environment (e.g. improved life expectancies) under the EPA's leadership over the past five decades. The evidence is clear that air pollution regulations have made incredible contributions to the health and wellbeing of Americans, but also that the job is not at all complete. The ISA deserves careful review by the best minds in the area in a time frame that allows them to digest and interpret it fully. Only then can EPA get robust and fair advice based on science. Under the current approach, we in the scientific community are having our voice muted, if not silenced. This cannot be the way forward. If it is, the US will not maintain its status as a scientific powerhouse and a land with a clean and healthy environment.

Respectfully,

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Associate Professor