

**Oral Testimony Before the CASAC Ozone Review Panel on the Second Draft Ozone ISA
(Clarifying Comment)
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Yesterday I stated that EPA should adopt a framework like the hypothesis-based WoE framework. I want to clarify that while it doesn't need to be this specific framework, it is critical that the framework EPA uses be improved.

CASAC has already offered advice on this, and I'd like to quote an October draft letter about the lead ISA from Drs. Frey and Samet. They stated:

“The causal analysis is not applied systematically or in a transparent way. In assessing studies related to a particular human health outcome, a critical analysis of the strength of evidence is often not done in the more detailed chapters upon which this summary is based (e.g., Chapters 5 and 7). Limitations of the data concerning selected endpoints are inadequately characterized. As a consequence, this chapter's summaries fail to capture important distinctions in level of causal association. A critical analysis should review the number of studies available on a topic; the strengths and limitations of study design, data, and analyses; and the distinction between short-term and chronic Pb exposure effects. Such a review is necessary for a defensible causality determination.”

CASAC should make similar comments about the ozone ISA, as the majority of these arguments apply.