

04-16-18 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Sulfur Oxides Panel. These preliminary pre-meeting comments are from individual members of the Panel and do not represent CASAC consensus comments nor EPA policy. Do not cite or quote.

**Preliminary Comments from Dr. Lianne Sheppard on the
03-29-18 Draft CASAC Review of the EPA’s *Policy Assessment for the Review of the Primary
National Ambient Air Quality Standard for Sulfur Oxides (External Review Draft - August 2017)***

For the consensus response to the charge question on Chapter 2, add the following paragraph on page 2 (starting at line 4):

“The CASAC notes that the final ISA did not address the spirit of CASAC’s requests for changes with respect to particulate inorganic sulfur(IV) (S(IV)) emissions from smelters and integrated iron and steel mills thus not capturing the special concern of emissions from these sources. This has implications for the selection of study areas in the REA and in turn for estimates of the impact of SO₂ on population health. Animal studies have shown that particulate inorganic S(IV) enhances the potency of SO₂ in animals (Amdur 1971 and Alarie 1973). This lack of attention to the potential impact of particulate inorganic S(IV) is an additional source of uncertainty in the assessment, particularly for high-risk subpopulations who live close to smelters and integrated iron and steel mills.”