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Yesterday I recommended that a third draft of the Integrated Science Assessment (ISA) be prepared to assure the scientific credibility of the ISA as a foundation for the rest of the Ozone National Ambient Air Quality Standard. The CASAC discussion yesterday and the EPA staff's pronouncement that "every molecule of Ozone impacts risk" and that the Agency intends to estimate total risk causes me to again recommend preparation and review of a third draft ISA.

The ISA revision and review should focus on the portions dealing with ambient background Ozone and the concentration-response coefficients for all health endpoints to be quantitatively estimated. Particular attention should be given to relating the scientific uncertainties in the concentration-response coefficients for various portions of the range of concentrations to be assessed for each of the concentration metrics and associated statistical forms and consideration.

Moreover, I ask that EPA make publicly available any science-based models and related computer codes to be used in preparation of the Risk/Exposure Assessments and Policy Assessments. This includes Air Pollutants Exposure Model (APEX), Benefits Mapping and Analysis Program (BenMAP) and the Quadratic Rollback Method so that any interested parties can replicate EPA's analysis. Further, I request that CASAC review current versions of each of these models/codes to ensure they are scientifically valid.