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US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

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EPA Acting Administrator Andrew Wheeler and the Clean Air Scientific Advisory Committee (CASAC):

Thank you for the opportunity to comment. I am the research director at the Center for Science and Democracy at the Union of Concerned Scientists. On behalf of more than half a million citizens and scientists, we advocate for the use of science for a healthy planet and a safer world. The Center for Science and Democracy works to advance the roles of science and public participation in policy decision-making. We have never advocated for an ambient air quality standard different from the CASAC recommendation, only to ensure the proper process is followed and scientific advice is heeded.

In its review of the particulate matter (PM) standard, I urge CASAC to follow a robust scientific process that produces particulate matter standards that protect the public health and welfare, as required under the Clean Air Act.

The PM Integrated Science Assessment (ISA) provides an important scientific update on the health and welfare effects of particulates. This document deserves to be scrutinized and improved by experts on all facets of the assessment—with ample opportunity for public comment. However, the process laid out by the EPA makes such a science-based and public-informed process challenging at best.

First, the decision by the EPA to dismiss the PM review panel will severely limit the degree of independent expertise the EPA will receive on the ISA and subsequent documents that inform the standard. This breaks with long-standing EPA process. For four decades, pollutant review panels have helped ensure EPA leadership is armed with the best available science on the effects of criteria pollutants on health and the environment.

These panels provide the necessary breadth of expertise on critical science and science policy issues for individual pollutants. Such expertise is especially necessary for the review of particulate matter, because of its complexity and variability in size, concentrations, and chemical composition.

It would be challenging for any seven-member CASAC to compensate for this lapse of expert input. Moreover, because the current CASAC lacks experts in key fields, such as epidemiology, it is difficult to imagine that the EPA's science assessment will receive the same robust scientific review it always has. I urge CASAC to reconvene the PM review

panel. Many qualified scientists are ready and willing to serve in such a capacity, as they always have. Several members of the current CASAC, in fact, echoed this need for pollutant review panels on the November 29 ozone call.

Given these limitations in expert input, it is crucial that CASAC rely on the wealth of knowledge in the published literature, as reflected in the ISA draft. CASAC should consider all available science at its disposal and it should rely on the established approach for assessing the causal links between particulate pollution and health impacts, as detailed in the preamble to the ISAs.ⁱ The causal framework employed by the EPA has evolved over the past decade, has been vetted by the scientific community via approval by several prior CASACs, and has been deemed adequate in the courts. It is the job of CASAC to make recommendations consistent with the current scientific understanding of the links between PM and health and welfare effects.

Further, the greatly expedited proposed schedule to complete the PM review by 2020 is likely to limit the ability of the EPA and CASAC to follow a science-informed process.ⁱⁱ Typically, the process of EPA staff, CASAC, and the PM review panel compiling, reviewing, and revising the ISA, Risk and Exposure Assessment (REA), and Policy Assessment (PA) requires far more time than this schedule allows. I urge you to follow a careful, robust process to assess the current state of the science on particulates and health, regardless of whether it meets the arbitrarily aggressive timeline laid out

Additionally, the expedited timeline with fewer drafts and fewer public meetings will mean fewer opportunities for public input. More than 23 million Americans live in areas with particulate pollution levels that exceed the current standard,ⁱⁱⁱ with serious public health consequences, including premature death, cardiovascular effects, and respiratory effects.^{iv} The public deserves sufficient opportunity to weigh in on a regulation with such far-reaching impacts.

The expedited time frame and planned merging of documents, combined with gaps in expertise on CASAC and the lack of PM review panel and public input opportunities— together—are likely to undermine the ability of the EPA to set a science-based standard for particulate matter, protective of public health with an adequate margin of safety, as required by the Clean Air Act.

I urge the committee to seek input from the necessary experts and to follow the timeline necessary in order to make a science-based recommendation that protects the public.

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ⁱ https://ofmpub.epa.gov/eims/eimscomm.getfile?p_download_id=526136

ⁱⁱ <https://www3.epa.gov/ttn/naaqs/standards/pm/data/201612-final-integrated-review-plan.pdf>

ⁱⁱⁱ <https://www3.epa.gov/airquality/greenbook/popexp.html>

^{iv} <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>