

## **Preliminary Comments on the PA from Dr. Sean Hays**

### **Comments on Chapter 4**

#### General Comments

- I agree with the caveats provided about the uncertainty in the science behind the NAAQS for lead. In particular I agree with, and appreciate EPA adding, the following statements.
  - Page 4-28, line 2-3: “We also recognize increased uncertainty in projecting the magnitude of blood Pb response to ambient air Pb concentrations at and below the level of the current standard”
  - “In staff’s view, based on current evidence there is appreciable uncertainty associated with drawing conclusions regarding whether there would be reductions in risk to public health from alternative lower levels as compared to the level of the current standard”.
- I agree that the new science does not support lowering the NAAQS any lower than its current level (0.15 ug/m<sup>3</sup>).

#### Specific comments

- Page 4-34, line 13: The following statement should be edited to; “Factors affecting relationships between Pb in ambient air and Pb in blood **at low exposures experienced in the general population today**”
- Page 4-34, lines 19-21: This statement is profound, but as written is too vague to be appreciated by the average reader. I would recommend editing to be something along the lines of; “Apportionment of blood Pb levels with regard to exposure pathways, with particular focus on understanding exposure pathways and sources that cause the more elevated blood lead levels among children today. “