

## ***COARSE PARTICULATE MATTER COALITION***

*879 N. KENTUCKY STREET  
ARLINGTON, VA. 22205  
(703) 525-3161*

March 24, 2009

Dr. Jonathan M. Samet  
Chairman  
Clean Air Scientific Advisory Committee  
EPA Science Advisory Board (1400F)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW.  
Washington, DC 20460

Re: Draft Integrated Science Assessment for Particulate Matter

Dear Dr. Samet:

With regard to the Committee's upcoming meeting to review the draft Integrated Science Assessment (ISA) for Particulate Matter, I am enclosing a copy of the Comments on the draft ISA submitted to EPA by the Coarse Particulate Matter Coalition. The Coalition is an organization of industry groups dedicated to scientifically sound regulation of coarse particulate matter (PM) in air.<sup>1</sup>

Our comments focus on several issues that were central to EPA's last review of the coarse PM standards. Specifically, we invite the Committee's attention to the following questions:

1. In the past PM review, a recurring theme in the comments of the Committee and individual members has been the absence of clear criteria for selection and evaluation of key studies. Is the Draft ISA adequate in this regard?
2. The current PM Criteria Document focuses clearly on the limitations of the health effects evidence for PM<sub>10</sub> and PM<sub>10-2.5</sub>, which the Committee recognized in the last review. It appears to us that many of the same limitations remain but have largely been omitted from the draft ISA. It also appears to us that the more recent health effects evidence for coarse PM tends to clarify that: (a) positive associations with PM<sub>10</sub> increasingly are

---

<sup>1</sup> Current members of the Coalition include the National Cotton Council, National Oilseed Processors Association, National Stone, Sand & Gravel Association and Kennecott Utah Copper Corporation.

tied to PM<sub>2.5</sub> components associated with traffic or other combustion sources; and (b) positive associations have not been clearly demonstrated for PM<sub>10-2.5</sub>. Does the draft ISA give adequate emphasis to the current limitations of the coarse PM evidence?

3. Similarly, in the last PM review the Committee placed a primary focus on the studies indicating absence of harm from exposure to coarse crustal material. Again, it appears to us that this information remains pertinent but has been omitted from the draft ISA. Does the draft ISA give adequate emphasis to the studies indicating absence of harm from exposure to coarse crustal material?
4. Scientists at Texas A&M University have published a number of studies indicating a substantial monitor bias in the presence of particles with a median diameter larger than 10 micrometers. The draft ISA dismisses these studies on the ground that they misunderstand the form of the current PM FRM. Does the draft ISA give adequate attention to the coarse PM monitor bias indicated in the Texas A&M studies?

These issues are discussed in detail in our comments, attached. We note that the omissions we see may be artifacts of the new, more streamlined approach to the scientific documents underlying the NAAQS review. We understand the need for a more streamlined approach. However, it should not be used to omit the necessary discussion of key scientific issues, regardless of whether the evidence has changed since the last review.

As in the past, we look to the Committee for guidance on these issues. We thank you all for your time and attention to these matters that so crucially affect our businesses and our lives. At present, we do not intend to make an oral presentation at the upcoming Committee meeting. However, I will attend the meeting and would be happy to answer any questions with respect to our comments or discuss them further.

Respectfully submitted,

Kurt E. Blase

*Counsel to the Coarse PM  
Coalition*