

05-23-16 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Particulate Matter 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 Do not cite or quote.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. Terry Gordon on
EPA's Integrated Review Plan for the National Ambient Air Quality Standards
for Particulate Matter (External Review Draft – April 2016)
05-23-16**

Overall organization and clarity: To what extent does the Panel find that the draft IRP is clearly organized and that it appropriately communicates the plan for the current review of the PM NAAQS and the key scientific and policy issues that will guide the review?

The overall organization and clarity are excellent. In addition, this may be a bit radical, but given the process design for the 5 year cycles, this planning document step seems a bit unnecessary. Much of the wording is consistent from NAAQS substance to substance, and the real information for deliberation is in the ISAs. So why not use a fixed and formatted Planning Document that is the same for all substances?

Under the discussion of the History (section 1.3, page 1-8), the first paragraph stresses secondary particle formation and leaves out sources for directly emitted PM (e.g., resuspension, wind blown, stack emissions) – perhaps the section could be better balanced.

Chapter 4 (Health Risk and Exposure Assessment):

To what extent does Chapter 4 clearly and adequately describe the scope and specific issues, including the identification of the most important uncertainties, to be considered in developing the HREA Planning Document for this review?

The Chapter clearly describes the scope and issues to be considered, including the uncertainties.

Is there additional information that should be considered or are there additional issues that should be addressed in considering the potential for risk and/or exposure analyses in the current review?

This reviewer is not aware of any additional issues to be considered in regards to the risk or exposure analyses. There did seem to be a large emphasis on urban data and risk considerations to the point of the rural risks being lost or at least very low in priority.

Chapter 6 (Policy Assessment and Rule Making):

On page 6-1, it is puzzling why it says REAs, 'if available', will be used in the PA. I've always assumed that REAs are an integral if not the integral support document for the Policy Assessment.