

03-23-19 Preliminary Draft Comments on the 03-07-19 Draft CASAC PM ISA Report.

These preliminary pre-meeting comments are from individual members of the CASAC to assist in meeting deliberations and do not represent CASAC consensus comments nor EPA policy.

-Do Not Cite or Quote-

Dr. James Boylan

CASAC Letter to Administrator

Minor Edits

- Page 1, line 41 – add “the” to read “...references do not follow the standard scientific method...”
- Page 1, line 43 – replace “or” with “and does not” to read “...definitions and does not systematically apply explicitly stated principles...”
- Page 3, line 5 – Add “UFP” to read “...modeling of UFP, PM_{2.5}, PM₁₀, and PM_{10-2.5} (coarse fraction) and...”
- Page 3, lines 29-32 – The last sentence of the paragraph states “The CASAC finds that the Draft ISA does not present adequate evidence to conclude that there is likely to be a causal association between long-term PM_{2.5} exposure and nervous system effects; between long-term ultrafine particulate (UFP) exposure and nervous system effects; or between long-term PM_{2.5} exposure and cancer.” This sentence should be made into its own new paragraph due to the importance of this statement.

Discussion Items

- Page 2, lines 5-7 – This bullet states “*Lack of scientific support for policy deliberations and decision-making.* The Draft ISA provides no empirically validated predictions or implications for how or whether possible future changes in particulate matter (PM) exposures would change public health risks.” However, I believe this information should be part of the Risk and Exposure Assessment (REA) rather than the ISA. The ISA determines causal relationships and C-R functions while the REA examines the impacts of various levels of PM exposure on public health risk.
- The CASAC letter to the Administrator recommends significant changes to the causal framework. EPA has been using this framework to support Integrated Science Assessments for the past 10 years. Also, the previous PM panel generally agreed with this approach as presented in the PM Integrated Review Plan (December 2016). There is substantial controversy over CASAC’s recommendations with regards to the causal framework approach used by EPA. Since this subject is outside my area of expertise, I do not feel comfortable providing consensus on a controversial subject that I am not intimately familiar with. For that reason, I will abstain from either agreeing or disagreeing with the CASAC comments related to the causal framework at this time.

CASAC Consensus Response to Charge Questions

Minor Edits

- Page 13, line 27 – Add “UFP” to read “...measurements and modeling of UFP, PM_{2.5}, PM₁₀, and PM_{10-2.5} (coarse fraction).

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Discussion Item

- Page 3, lines 22-42 and Page 4, lines 1-2 – This section discusses states “*Lack of scientific support for policy deliberations and decision-making.*” Again, I believe this information should be part of the Risk and Exposure Assessment (REA) rather than the ISA. The ISA determines causal relationships and C-R functions while the REA examines the impacts of various levels of PM exposure on public health risk.