



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 17 2006

MEMORANDUM

SUBJECT: Request for Clean Air Scientific Advisory Committee (CASAC) Members' Input into the Review of National Ambient Air Quality Standards NAAQS Review Processes

FROM: William Wehrum
Acting Assistant Administrator
for Air and Radiation

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George Gray
Assistant Administrator
for Research and Development

A handwritten signature in black ink, appearing to read "G. Gray", written over the typed name.

TO: Vanessa Vu, Director
Science Advisory Board Staff Office

Last December, Deputy Administrator Marcus Peacock asked us to conduct a "top-to-bottom" review of the process used to periodically review and revise, as appropriate, the air quality criteria and national ambient air quality standards (NAAQS), as required by sections 108 and 109 of the Clean Air Act (Attachment I). In part, the Deputy Administrator asked us to "determine whether (and if so, how) the agency utilizes the best available science to set the NAAQS." Another key interest is to examine ways of designing a streamlined process so EPA can achieve more timely NAAQS reviews. In carrying out this request, we have begun a review of the Agency's current NAAQS review process. As requested, we have agreed to provide the Deputy Administrator with a set of recommendations by April 3, 2006.

Clean Air Scientific Advisory Committee (CASAC) members have a unique perspective on the NAAQS review process. Their experience as CASAC members provides them with a special insight into the interpretation and presentation of scientific information on the criteria air pollutants and the use of that information in setting the NAAQS. Therefore, we would value their individual views on the current process, including what is currently working well and what recommendations they might have to improve the process for achieving a comprehensive and

timely review of the NAAQS. To help address the range of issues raised by the Deputy Administrator, we have prepared a set of key questions on which we would appreciate having CASAC members focus as they formulate their response to this request (Attachment 2).

We appreciate the members' time in considering and responding to this request, and look forward to their input on this important matter

Attachments



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December 15, 2005

FROM: Marcus Peacock *MP*
TO: Dr. George Gray
Assistant Administrator for the Office of Research and Development
Bill Wehrum
Acting Assistant Administrator for the Office of Air and Radiation
RE: National Ambient Air Quality Standards

DEPUTY ADMINISTRATOR

An essential component of EPA's mission is to ensure that the best available science guide and inform agency decision making. This principle has been and continues to be a major focus of the agency. Under the heading "Achieving Results," the 2003-2008 EPA Strategic Plan notes that, "EPA's approach to conducting and using science in service to the Agency's mission will ensure that Agency policies, decisions, and other activities reflect high-quality scientific information relevant to current and future environmental issues." EPA must follow guidelines and procedures so that "our work meets the highest standards of scientific excellence."

Using best available science to accelerate environmental progress and protect public health is a top priority for the Administrator. To help achieve this goal, the Administrator has asked me to examine whether the process for setting National Ambient Air Quality Standards (NAAQS) can be strengthened. The current NAAQS process has been in place for over 20 years, with some aspects required by law, and therefore not amenable to changes except through new legislation. Other important aspects of the NAAQS process, however, are discretionary—the agency has established practices that set parameters for how science supports decision making. The Administrator is interested in determining whether those practices reflect the most rigorous, up-to-date, and unbiased scientific standards and methods.

To fulfill the Administrator's directive, I am asking you to establish and co-chair an agency working group to determine whether (and if so, how) the agency utilizes the best available science to set the NAAQS. In its examination, the working group should conduct a top-to-bottom review of the NAAQS process.

The working group should consider four reports (1998, 1999, 2000, and 2004) conducted by the "Committee on Research Priorities for Airborne Particulate Matter," which was created by the National Academy of Sciences (NAS), as well as "Science and Judgment in Risk Assessment," in which the NAS offered specific recommendations on how EPA can improve its risk assessments.

In addition, the working group should focus on the nexus between scientific analysis and standard setting, including the degree to which we are successful in ~~separating the exposition of scientific information from the development of risk~~ management strategies and policy judgments. It should also examine whether the process for compiling the Criteria Document allows for consideration of the most relevant, objective, and up-to-date scientific data. The working group should address and propose ways to ensure broad participation of the scientific community in the NAAQS process. Finally, the working group should consider whether and how these objectives can be satisfied within the statutory 5 year review period.

It is imperative that the NAAQS process adheres to the highest scientific standards so we can continue to make environmental progress and protect public health. The working group is charged with issuing specific recommendations to me no later than April 3, 2006. I look forward to working with you and the agency's top scientific experts on this very important subject.

Attachment 2

Key Questions for the Review of the Process for Setting NAAQS

- Timeliness of the NAAQS review process
 - What are your views on the timeliness and efficiency of the current process for both EPA's and CASAC's reviews of the air quality criteria and the NAAQS, in terms of the time that is spent between the start of the review and the publication of the Agency's proposed decisions on the standards?
 - Can you identify structural changes to the process and/or key documents (e.g., the Criteria Document, Staff Paper, Risk Assessment) or changes in the Agency's management of the process that could shorten this time frame while preserving an appropriately comprehensive, transparent and policy-relevant review and allowing adequate opportunities for CASAC review and advice and for public comment on these documents?
- Consideration of the most recent available science
 - To enhance the Agency's ability to take the best and most recent available science into account in making decisions on the standards, can you suggest changes in the process and/or key documents that could shorten the time between the presumptive cutoff date for scientific studies evaluated in the review and reaching proposed decisions on the standards, or that could otherwise facilitate appropriate consideration of more recent studies?
- Distinctions between science and policy judgments
 - Recognizing that decisions on the standards, while based on the available science, also require policy judgments by the Administrator, what are your views on how clearly scientific information, conclusions, and advice are distinguished from policy judgments and policy recommendations on the standards throughout the review process?
 - Can you suggest changes in the process and/or changes to the format and contents of key documents that would help to make these distinctions clearer?
- Identifying, characterizing, quantifying, and communicating uncertainties in scientific information
 - Recognizing the importance of characterizing and clearly communicating the uncertainties in the science and quantifying uncertainties in exposure and risk estimates as explicitly as possible, what are your views on any changes in the process and/or changes to the format and content of key documents that might facilitate a more complete, quantitative, and policy-relevant characterization of uncertainties?