

## **Preliminary Comments on the PA from Dr. Philip Hopke**

I would like to start with a broad comment. I would hope we could see the United States moving to eliminate a NAAQS for airborne lead. Now is not yet the time, but this should be part of the discussion in the next round of review. If we eliminate lead in aviation gas and in wheel weights, we will have removed the remaining major dispersed sources of lead other than resuspended soil. All of the remaining point sources whether lead or other metal processing could be handled under HAPs rules. We will need to eliminate these final sources (aviation gasoline in particular), but then it is time for a serious discussion of the further need for a lead NAAQS or whether the resources that currently go into this process would be better used to address other widely dispersed pollutants from multiple sources such as benzene or mercury.

### **Comments on Chapter 2**

*1. To what extent does the Panel agree that the most relevant information on emissions (section 2.1), air quality (section 2.2.2), and Pb concentrations in other media (section 2.3) is presented, and to what extent is the information presented appropriately characterized and clearly communicated?*

Staff has done a good job of summarizing the information from the ISA. The chapter provides a good background to the discussions in the following chapters.

*2. With regard to information on ambient Pb monitoring (section 2.2.1), to what extent is this information appropriately characterized and clearly communicated?*

The statistical justification for a never to be exceeded standard has never been presented. It is a hangover from prior standards that does not seem to have been adequately considered and reviewed. Given the natural variability of the environment, this form of the standard represents a poor coupling of science to reality and it would be much better if the form of the standard better reflected that control should be based on the distribution of lead concentrations. Other forms of the standard can be set to be highly restrictive on the range of concentrations so as to provide the requisite protection of public health while still recognizing the variable nature of the system. It would be useful to see an adequate statistical discussion of the standard form and a justification that this form is appropriate to provide the protection required.