

COARSE PARTICULATE MATTER COALITION

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May 4, 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:

By letter of March 24, 2009, I provided 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 interests dedicated to scientifically sound regulation of coarse particulate matter (PM) in air.¹ I then attended the CASAC meeting in NC to discuss the draft ISA on April 1-2.

We understand that CASAC will be meeting by telephone on May 7, 2009 to finalize the Committee's letter on the draft ISA that was circulated in draft at the NC meeting. We invite the Committee's attention to two issues discussed at the meeting and in the draft letter:

1. **PM monitor bias**. With respect to measurement issues, the draft letter states that "the section on measurement issues needs to be improved. There needs to be a more complete discussion of PM mass measurements and the serious limitations of the current FRM for PM" (p. 4). We urge the Committee to clarify that the limitations of the FRM include the monitor bias discussed in the presentation of Dr. Michael Buser of the U.S. Department of Agriculture and explained in the published studies that Dr. Buser submitted. The draft ISA dismisses the bias as an intended artifact of the current FRM, which intentionally collects some particles large than PM10 (p. 3-17). However, as

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

discussed in our comments (pp. 12-13) and Dr. Buser's materials, this position greatly oversimplifies the evidence of the bias, which is much larger than could be caused by this aspect of the FRM.

2. **Coarse PM "carrier" issue**. It was apparent from the meeting that a continuing area of scientific debate involves the question of coarse particles as "carriers" of potentially toxic constituents that are not present in the particle as originally emitted but are adsorbed or otherwise added to particles as a result of other emission sources. This issue is addressed in our comments at p. 12. The relative absence of direct evidence on this point was discussed at the meeting and appears to be addressed in the draft letter, which states that "there is a lack of information on the presence of chemically reactive species associated with particles (particularly SOA and their formation by atmospheric chemistry) and of the chemical composition of coarse particles" (p.4). We urge the Committee to clarify that additional evidence on the "carrier" capacity of coarse PM is needed.

As always, we thank you and your colleagues on the Committee for your time and attention to these important matters.

Respectfully submitted,

/s/Kurt E. Blase

Kurt E. Blase

*Counsel to the Coarse PM
Coalition*