

05-22-16 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 Do not cite or quote.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. John Adgate on
EPA's Integrated Review Plan for the National Ambient Air Quality Standards
for Particulate Matter (External Review Draft – April 2016)
05-22-16**

Comments on Chapter 4 (Health Risk and Exposure Assessment)

I have reviewed the document with particular focus on Chapter 4.

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 description of the proposed approach for the HREA is for the most part clear and reasonable. It identifies the major uncertainties, and to the extent feasible in a draft plan, is comprehensive in its approach and description of key uncertainties.

Chapter 4 could be strengthened if it had a conceptual diagram similar to those in Chapters 2 and 3 that pull together the key data and approaches and make clear how the exposure and risk assessment analyses are distinct from the approaches described in those other chapters. It would also provide insight into how an integrated approach for addressing uncertainty would be implemented across the proposed analyses.

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?

At this time, I am not aware of additional information that should be considered, but given the uncertainties identified in Chapter 4, considering expanding the analysis beyond the 15 cities used in the 2010 HREA is an approach that should be considered. Expanding the spatial and temporal scope of the analysis may help increase our understanding of the impacts of variability and uncertainty on exposure and risk over time. If the decision is made to not expand the temporal or spatial scale of the analysis, then the reasons for this limitation and implications for exposure and risk estimation discussed and justified.