

Oral Comments to the CASAC meeting 12/12/18 to review the draft PM ISA
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Good morning; I want to thank CASAC and EPA for this opportunity to provide comments on the NAAQS review process. I am a former member of CASAC and the recently disbanded PM review panel. My comments do not necessarily represent the views of my employer NESCAUM or those of the NESCAUM member states, although I refer you to the comments NESCAUM has submitted for this meeting. While I am concerned about many recent changes to CASAC and the NAAQS review process, I want to focus these comments on the accelerated schedule for completion of the PM NAAQS review that EPA presented this morning that substantially deviates from the 2016 Final Integrated Review Plan for PM.

To meet this highly expedited schedule, EPA proposes to skip key steps of the NAAQS review process. These include reviewing revised drafts of the ISA, REA planning documents, REAs, and the PA, and reviewing these documents in a staggered sequence with sufficient time left for EPA staff to incorporate CASAC advice from one document before proceeding to the next document. I have several concerns with this expedited schedule.

First, EPA proposes that CASAC review only the first external review draft of the ISA and that, irrespective of comments from CASAC and the public that may call for a second external review draft, the ISA be finalized without further review.

Second, it appears that CASAC will not be provided with planning documents for the health and welfare REAs.

Third, EPA proposes that there not be separate documents for the health or welfare REAs, but that the REA's "quantitative risk and air quality analyses" be incorporated into an external review draft of the PA.

Fourth, EPA proposes that CASAC review only one draft of the PA. Thus, EPA proposes that CASAC not review the scientific basis of the health or welfare REAs prior to their use in the PA, thereby commingling science and policy issues and leading to a less transparent treatment of these issues.

Fifth, EPA proposes that regardless of comments from CASAC and the public that may call for a second external review draft, the PA be finalized without further review by the end of next year. This proposed schedule reduces the number of public meetings of CASAC, thereby leading to fewer opportunities for public comment.

CASAC should not agree to these changes to the review process or to the accelerated review schedule proposed today by EPA. The schedule should allow for second and possibly third drafts of review documents. The agency should allow time for an adequate review by relaxing its fall 2020 deadlines for final rules for both ozone and PM.

The previous PM review cycle demonstrates the time needed to adequately review NAAQS documents; the process took 24 months from review of the draft ISA to issuing the final PA. The December 2016 Final Integrated Review Plan for this review cycle allowed 2 ½ years. The review schedule presented today allows 12 months

Additional time is needed by EPA after receiving "closure" on CASAC's advice, to formulate and publish its proposed rule, obtain and respond to public comment, and formulate

and publish its final rule. For recently completed review cycles of criteria pollutants, it has taken EPA an average of 23 months to finalize a rule. Today's schedule allows only 12 months to finalize the rule after receiving CASAC's advice.

In conclusion, I recommend that CASAC reject EPA's accelerated review schedule in favor for one that allows sufficient time for a staggered sequence of first draft documents for each of the ISA, REAs, and PA, with time allowed for CASAC and public input on the first draft of a document to be addressed prior to issuing the first draft of the successive document in the review process. EPA should not propose to combine documents such as the REA and PA in a NAAQS review as a matter of routine procedure. Finally, time should be allocated for second drafts of all review documents – the schedule in the 2015 draft IRP allowed for two drafts of each of the ISA, REA, and PA. For more detail on these recommendations, please see the written comments submitted for this meeting by “15 Former Members of the CASAC PM Review Panel that was Disbanded on October 11”.