

05-05-11 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Lead Review 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 Do not cite or quote.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. Chris Johnson

4-5, lines 8-20 - In selecting studies to consider, it is probably best to cast a wide net. Setting an example for the “low end of the exposure distribution” in item #1 on this list may result in the omission of valuable studies measuring effects at slightly higher levels.

Also, it would be useful here (item #3) and elsewhere in the document to expand on what is meant by “susceptible populations.”

4-7, lines 8-9 – How does EPA propose to assess the quality of data found in the peer-reviewed literature?

4-13, lines 1-3 - Item 1a: How realistic is it to use animal studies of susceptibility factors to identify susceptible human populations.

4-14, lines 13-14 - The identification of terrestrial ecosystem receptors useful for risk assessment would be a valuable contribution in this ISA process, even if there are few data on specific effects.

4-14, lines 7-35 - Critical loads are generally calculated on the basis of chemical flux rather than air concentration. Could a secondary standard be developed on the basis of, say, atmospheric deposition of Pb rather than air concentration? If not, are there reliable relationships between air concentrations and deposition?