



28 March 2019

US Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Docket Numbers: EPA-HQ-OAR-2015-0072; EPA-HQ-ORD-2014-0859

Oral Comments of John Bachmann on behalf of the Environmental Protection Network

Thank you for the opportunity to comment. I am representing the Environmental Protection Network (EPN). In my 33 years in Science Policy at EPA, I was heavily involved in all reviews of the PM NAAQS through 2006.

I am speaking today because EPA has wholly ignored concerns we and many others made months ago regarding the need to return the NAAQS review process to a sound and unbiased science and policy footing. The CASAC draft letter is evidence that this continued inaction has resulted in an understaffed and deeply divided committee that lacks the expertise, experience, and balance needed to ensure the quality and credibility of the NAAQS review process.

EPN is particularly concerned that the main body of the draft letter is dominated by a view of the approach for assessing causality in this PM ISA that is inconsistent with CASACs 2016 guidance on the ISA plan, out of the mainstream, and ill supported by the currently available scientific information.

Our main conclusions and recommendations, detailed in our written comments:

- The process the EPA Administrator has adopted for this review of the PM standards is fatally flawed.
- The best and fastest way to restore credibility would be to reinstate the already vetted expert panel. EPA and CASAC should reject suggestions for half measures to add expertise, variously involving cherry picking a few individuals new to the process or worse, relying on a crowd sourcing contractor.
- CASAC should not attempt to prepare a comprehensive consensus letter at this time. EPN agrees with the suggestion by Dr. Frampton to convene an additional public meeting with the reinstated panel *“before CASAC finalizes its advice on the current draft ISA.”*
- The Chair’s preemptive rejection of the chartered CASAC’s 2016 guidance on the weight of evidence approach for this PM ISA and his suggestion of an unworkable hypothesis

testing approach blindsided EPA staff and are unreasonable at this point in the process. Nor is such a change supported by the current state of the science.<sup>1</sup>

- EPN agrees that a second draft of the ISA is needed. EPA staff should consider individual CASAC comments, taking practical suggestions that would improve the current draft. This should include considering the ISA comments sent by the group of former CASAC panel members.<sup>2</sup>
- EPN recommends that EPA conduct a conditional search for particularly relevant papers published since mid-2017. These are not limited to negative studies.
- EPA should be wary of suggested “systematic” criteria for excluding epidemiology studies, as the current CASAC panel lacks such expertise. For example, the criterion to exclude long term cohort studies that don’t correct for temperature is based on speculation,<sup>3</sup> not evidence. The HEI reanalysis of two cohort studies in 2000 did include an adjustment for temperature, finding little if any change in the results.<sup>4</sup>
- In response to Dr. Packham’s recent comments, is it possible to believe that such ill supported criteria, which quote “*would eliminate most (possibly all) of these numerous studies*” would not jeopardize the protection afforded by the PM NAAQS? We remain concerned.

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<sup>1</sup> Goldman, G.T. and F. Dominici. (2019) Don’t abandon evidence and process on air pollution policy. *Science*. 21 March. DOI: 10.1126/science.aaw9460. Online

<sup>2</sup> Frey, H.C., A.V. Diez Roux, J. Balmes, J.C. Chow, D.W. Dockery, J.R. Harkema, J. Kaufman, D.M. Kenski, M. Kleinman, R.L. Poirot, J.A. Sarnat, E.A. Sheppard, B. Turpin, and S. Vedal, “CASAC Review of EPA’s Integrated Science Assessment (ISA) for Particulate Matter (External Review Draft – October 2018),” 34 page letter and 100 pages of attachments submitted to Chair, Clean Air Scientific Advisory Committee, U.S. Environmental Protection Agency and to Docket EPA–HQ–ORD–2014-0859, December 10, 2018. [https://yosemite.epa.gov/sab/sabproduct.nsf/086D8B853E0B63AE8525835F004DC679/\\$File/PMRP+Letter+to+CASAC+181210+Final+181210.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/086D8B853E0B63AE8525835F004DC679/$File/PMRP+Letter+to+CASAC+181210+Final+181210.pdf)

<sup>3</sup> L. A. Cox Jr., D. A. Popken, Has reducing fine particulate matter and ozone caused reduced mortality rates in the United States? *Ann. Epidemiol.* **25**, 162–173 (2015). doi:10.1016/j.annepidem.2014.11.006 Medline

<sup>4</sup> Health Effects Institute. Reanalysis of the Harvard Six Cities Study and the American Cancer Society Study of Particulate Air Pollution and Mortality (2000). <https://www.healtheffects.org/publication/reanalysis-harvard-six-cities-study-and-american-cancer-society-study-particulate-air>