

I am William Rom MD, MPH of the New York University School of Medicine. I am also chair of the American Thoracic Society Environmental Health Policy Committee and today I am speaking on behalf of the American Thoracic Society.

I will attempt to be succinct. CASAC has considered the evidence. With the support of EPA professional staff, this committee has reviewed, analyzed and synthesized volumes of research on the health effects of particle pollution. The effort was comprehensive and attentive to public input from industry, environmental groups, the scientific community and the public at large.

As we have commented to this Committee before, the American Thoracic Society supports a much more protective suite of standards than currently exists for the PM NAAQS. The Society has urged this committee and the administration to recommend a standard of 12  $\mu/m^3$  for the average annual standard and 25  $\mu/m^3$  for the 24-hour, set at the 99<sup>th</sup> percentile form. Such levels would be based in the available scientific studies, expert advice, and, most of all, be responsive to legislative mandates of the Clean Air Act - namely the requirement to ensure an adequate margin of safety.

The Society recognizes that the Committee arrived at different conclusions. Nonetheless, the Committee's recommendations provided more protection to public health than is contained in the administration's proposal. The Administration's proposal ignores available research evidence. It provides no margin of protection. It ignores the advice of the experts – most notably – the expert advice of this panel.

The question before CASAC is how it should respond. The American Thoracic Society strongly recommends that this committee formally contact the EPA Administrator Johnson to:

- Reaffirm the original CASAC recommendation of 13 or 14  $\mu/m^3$  average annual standard, 30-35  $\mu/m^3$  24-hour standard and 98<sup>th</sup> percentile form
- Express concern that the CASAC recommendations were not adhered to, and
- Express concern that the proposed EPA standard is not responsive to the available science, expert opinion and Congressional intent.

The ATS appreciates the opportunity to present our views before this committee and I would be happy to answer any questions.