

Aaron,

I have attached a document that includes public comments submitted to the Independent Particulate Matter Review Panel, which was held on October 10th and 11th. You can find more information on the panel at www.ucsusa.org/pmpanel . These comments are from the individuals who submitted them, and they do not represent the Union of Concerned Scientists.

Thanks,
Shea

Shea Kinser

Program Assistant, Center for Science and Democracy

[Union of Concerned Scientists](http://www.ucsusa.org) | 1825 K Street NW, Suite 800 | Washington, DC 20006-1232

Particulate matter in our atmosphere is of great concern to me.

As a citizen scientist I am writing to report that black soot accumulates on my home window-sills with regularity. My neighbors comment on this also. Since we are about a mile from an interstate, I suspect diesel exhaust from trucks contribute to this air-borne dirt. Additionally, a coal-fired power plant about 10 miles to the west very likely contributes to the particulate problem.

I fully endorse and support the effort of the Union of Concern Scientists to maintain research and data gathering on particulate matter in the atmosphere. For my health and the health of all Americans, this is vital work that must continue so that we can continue to reduce the amount of air pollution and particulate matter we are exposed to.

Thomas Cislo
Covington, KY



October 6, 2019

To the Independent Particulate Matter Review Panel
RE: Public Meeting of October 10-11, 2019

On behalf of the members of the Clean Fuels Development Coalition, including Farmers Union Enterprises, Urban Air Initiative, and others, we applaud your actions to reconvene and continue your important work to protect public health.

We believe the issue of fine particulate matter is grossly ignored by EPA and the scientific expertise your panel provides is critical to ensuring maximum standards and controls. By EPA's own admission they fail to account for polycyclic aromatic hydrocarbons (PAH's) and have ignored the overwhelming evidence of the causation as it relates to gasoline. We urge this panel to include the importance of regulating mobile source air toxics as a key consideration in setting ambient particulate standards. Coupling standards with enforcement of existing provisions such as section 202 (I) of the CAAA, i.e. the toxics provision, is critical if we are to provide maximum public health protection.

We have conducted extensive research on gasoline composition and the negative effects of the highly carbon intensive toxic aromatic compounds refiners use to increase octane. The microscopic benzene-based emissions defy any vehicle filtering technology and equally defy the human lung as a filtering mechanism. Consequently, there is an increasing body of evidence that these fine particulates directly enter the bloodstream and are causing neurological ailments as well as respiratory disease.

We respectfully ask that you consider several attached documents providing much more detail on this subject, beginning with our [*Mobile Source Air Toxics Fact Book: What's In Our Gasoline is Killing Us*](#). This extensively researched and sourced fact book should be of direct relevance to this subject. Similarly, an article in *The Guardian*, [*Revealed: air pollution may be damaging every organ in the body*](#), referencing work by Dr. Schraufnager, also supports these findings.

We also have submitted detailed comments to the U.S. Environmental Protection Agency and the Department of Transportation on the pending [*Safe Affordable Fuel Efficiency \(SAFE\) Rule*](#) which would set standards for the next phase of the original Corporate Average Fuel Economy (CAFE) rule. In their solicitation of comments EPA specifically asked how the role of octane would be consistent with Title II of the Clean Air Act, which is the title that requires EPA to reduce mobile source air toxics. Increasing octane to a 98-100 RON (Research Octane Number) would provide significant cost-effective benefits, allowing automakers to downsize engines and increase compression ratios to achieve greater mileage while emitting less carbon and of course, using less petroleum. However that octane cannot come from the oil barrel as it would be illegal under the Clean Air Act. We are concerned that EPA is well aware of this and therefore will not increase octane in the SAFE rule, thereby denying the benefits that would come from the aforementioned downsizing of engines and improving efficiency.

CFDC CLEAN FUELS DEVELOPMENT COALITION

We can do both—increase octane as the maximum control technology, and do so in compliance with the toxics controls required by law. I refer you to a recent article [It's time to take another look at biofuels article by Sen. Chuck Grassley \(R-Iowa\) and former Sen. Timothy Wirth \(D-Colo.\) and Chairman of the UN Foundation](#), urging the environmental and health communities to look at 30% ethanol blends as a readily available tool.

We have the ability to directly address the threat of ultra-fine particulates through cleaner fuels, and to focus on gasoline emissions which are the predominant source of these harmful particulate emissions.

Thank you in advance for your consideration of our position. We hope you will review the referenced material and we would be very pleased to provide additional information. We have a landing page on our website dedicated to our [SAFE Gasoline Campaign](#) that is also an excellent source of information on the entire subject of gasoline, UFPs, and related areas.

Sincerely,

Douglas A. Durante

Douglas A. Durante
Executive Director

I am a retired marine scientist and grassroots environmental activist living on Cape Cod, Ma. I feel that the Environmental Protection Agency would benefit from independent scientific advice on particulate matter and its effects on air pollution. I have not personally worked on air pollution issues here on Cape Cod, but have been concerned in the past by methyl mercury contamination of fish in Ashumet Pond (from airborne coal plants in the Midwest) and high Summer ozone levels in the air on the outer Cape which are often higher than those in downtown Boston (from regional nitrous oxide pollution from off-Cape automobiles).

I did testify at the EPA/US Army Corps of Engineers online hearing in the Fall of 2017 on the Waters of the US(WOTUS) proposal to change the jurisdictional boundaries for the CWA; SDWA; CECLA; TSCA, etc. In the introduction, the EPA and COE spokespersons didn't mention either science or environmental protection, but instead concentrated on President Trump's Executive Order to remove environmental constraints to business development; their new policy on federalism and former Supreme Court Judge Scalia's narrow interpretation of WOTUS. It appears that a similar shift in rule making by EPA is for the Clean Air Act is underway which ignores science and environmental protection. As a candidate President Trump promised to reduce the adverse public health effects of air and water pollution. **How can EPA continue to roll back the CWA and CAA regulations designed to protect public health ?**

Before retiring in 2008 while working at NOAA and NASA, I worked with scientists at EPA on research proposals on eutrophication or the Waquoit Bay Watershed Ecological Risk Assessment project. I feel that the Agency's scientific staff and contractors need more support (people and \$) to help the regulators, policy makers and managers develop more effective in ways to protect public health and the environment. Current EPA policy pronouncements have just the opposite effect and are bad for the environmental and socioeconomic systems here on Cape Cod.

Nitrogen enrichment of our coastal embayments from the regional airshed is a major problem for both water quality and loss of seagrass Essential Fish Habitat for fish species like bay scallops. Ocean acidity and periodic hypoxia have severe consequences for various shellfish species which are employed in aquaculture and harvested by commercial/recreational fishermen/women. High mercury levels in fish in Ashumet Pond have lead to fish consumption alerts for women of child bearing age and children. Ashumet Pond and the Fire Training Area at Joint Base Cape Cod are source areas for PFAS contamination of private and public water sources in Mashpee and Falmouth. Phosphorus enrichment from the former wastewater treatment plant at JBCC has lead to Summer hypoxia in the bottom waters of Ashumet Pond and periodic cyanobacterial blooms in the surface waters.

Thus the policies of EPA Region 1 have negatively effected both our natural environment and "Blue Economy" which is a **double whammy**.

Thanks for your consideration of these comments.

Dr. David D, Dow
East Falmouth, Ma.

Part of EPA's mission is to protect public health. Numerous peer reviewed studies and expert panels have concluded that air pollution is associated with adverse health effects (<https://www.sciencenews.org/article/list-diseases-linked-air-pollution-growing>).

If EPA rolls back or reduces funding for controlling air pollution, it is failing in its mission to protect public health. It is that simple.

Thank you,
Mark

Mark H. Follansbee, Ph.D.
Scarborough, ME

PM2.5 is a chronic problem where I live (Fairbanks, Alaska) and we need the EPA help us figure out and mitigate the health risks.

Thank you,
Anna Godduhn

I am 86 years old. Before I started school I learned that automobile and truck exhaust has carbon monoxide in it that is very bad for the health of anyone who breathes it. So I have done as well as possible to avoid it. But maybe some people don't know this. There has been some improvements in regulation such as no longer putting lead in gasoline. There should be more.

I think we should do a better job of letting people know about things like this and we should be given choice about how to avoid this. Auto and truck manufacturing should be better regulated.

Elery Keene
Winslow, Maine

I am writing as a family practice physician and public health advocate to strongly urge the EPA to withdraw ill-informed pollution standards that fail to protect the public, especially our most susceptible populations such as children and the elderly, from the dangers of pollution-induced attacks of asthma in our children and chronic shortness of breath and lung disease in our families and elderly Americans.

Hope this helps to stimulate a call to the EPA to propose air pollution standards that protect all American families.

Sincerely,
Jean Marie Naples, MD-Ph.D.

Particulate matter is especially insidious because, once inhaled, it does not leave the body: particulate matter will circulate in a person's blood and wreak havoc in his/her organs. That is largely due to particulate matter's shaft construction.

Pat Waring

I've studied and published on this in the MD/DC Anacostia/Potomac. Yes the DC sediment surface has the fish contaminants and 70-90% are from MD. The contaminants are accumulated by worms living in DC sediment surface and which are a major food of DC fish. Action must start in MD.

Harriette Phelps

There are NO legitimate reasons for the Particulate Matter Advisory Panel to have been disbanded. Particulate pollutants have been recognized as fundamentally harmful to human health for decades. Independent, unbiased expertise on these substances is vital to the formation of sound, scientifically-based regulation to safeguard human and animal health, the safety of our water, and the safety of our crops.

ABSENT this independent, unbiased expertise, the only sources of information will be industries with a vested financial interest in preventing regulation, regardless of the dangers to all of the above. This will NOT lead to "sound science" but to "science in the corporate interest".

I would support any actions necessary to overturn Andrew Wheeler's ruling on this, including legal action.

Thank you.

Rob Benjamin, CRISC, CGEIT
Hamilton, NJ

It's time to give the EPA the air pollution science they're trying to ignore.

UCS is reuniting the independent panel of experts that the EPA disbanded, to do what the agency has thus far failed to do: review the EPA's assessment of the science linking particulate pollution and public health.

Barbara H. Warren, MD, MPH; ED PSR Arizona

Tucson, AZ

Hi there,

I am a healthcare analyst and technical writer and I strongly support having the independent panel of scientific experts analyze data and make recommendations based on sound science. The Trump Administration doesn't care about health, the environment, or climate change, they only care about short term financial gains for the top 10%.

We are all adversely impacted by their actions, so please make your voices know.

Thanks

Roberta Winter, MHA, MPA