

02-03-13 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 Do not cite or quote.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 on the PA from Dr. Michael Rabinowitz

Comments on Executive Summary and Chapter 1 (Introduction)

Does the Panel find the introductory and background material, including that pertaining to previous reviews of the Pb standard and the scope of the current review to be appropriately characterized and clearly communicated?

Yes, this text adequately provides the reader with a clear, stand-alone basis to make the decision to retain or revise the current standard. The regulatory background material and the review of the lead pathways in Chapter 1 are satisfactory and sufficient.

Some small additional comments:

On page ES-1 line 25, why not add for emphasis ...This approach was taken to aid in the decision to retain or revise the current standards.

line 31 I concur that retaining the current air standard makes sense, because air lead is not the problem now. Even if we were to move the standard to zero, the response in blood lead levels would be very small, given the other sources of lead exposure.

In Chapter 2 page 2-8 line 22 perhaps add....and these are expected to decrease further with the passage of time.