

ORAL STATEMENT  
**Public Comment on the  
CASAC Review of EPA's Integrated Science Assessment for Particulate Matter  
(External Review Draft – October 2018)**

PREPARED BY:

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SUBMITTED TO  
**Clean Air Scientific Advisory Committee**  
**U.S. Environmental Protection Agency**  
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I am a past chair of CASAC. These comments are on behalf of myself.

Since October 2017, arbitrary changes to CASAC and the NAAQS review process have been implemented by EPA without input from CASAC or the public. These changes are inconsistent with requirements of the Clean Air Act and with well-established precedent. These changes harm the quality, credibility, and integrity of NAAQS science review.

In October 2017, Administrator Pruitt signed a memo that changed the rules for appointments to CASAC. He did not ask for input from CASAC or the public. The memo directs that appointments be based on geographic diversity and government affiliation, not scientific qualifications, and called for more member turnover. Pruitt also barred scholars who receive EPA research grants. The latter is inconsistent with guidance from OMB and a review by EPA's Inspector General. These changes harm the credibility of CASAC and serve to make it less effective and less efficient.

At the start of the current review of the PM standard in 2015, CASAC was supported by an expert review panel, of which I was a member, that included two dozen nationally and internationally recognized experts from a wide range of relevant scientific disciplines. On October 11, the agency told us that our panel was disbanded. This dismissal was done without advance notice, discussion, opportunity for input, or reasonable explanation. Four days later, EPA released the nearly 1900 page draft ISA that our panel was to review. EPA is asking new, inexperienced CASAC members to review particulate matter science, without the necessary scientific expertise and in record time, while summarily kicking out a distinguished group of the very experts needed for this review.

In response to these changes, 15 members of the disbanded PM review panel, including 8 former members and 2 former chairs of the chartered CASAC, have written a 34 page letter, with 100 pages of comments from individual members. Please read the full document. We have 8 major findings and 44 recommendations for restoring the quality, credibility, and integrity of the science review process. Among these recommendations:

- EPA and CASAC should form an Ozone Review Panel and reinstate the PM Review Panel
- EPA should prepare a second draft of the ISA for review by the reinstated CASAC PM Review Panel
- EPA should allow time for an adequate review of the ozone and PM standards by relaxing its deadlines to at least 2022
- EPA should not commingle science and policy assessments
- CASAC should not commingle assessment of the effects of implementation of a NAAQS with assessment of the science and policy related to setting NAAQS
- Membership criteria for the chartered CASAC and for its augmented panels should emphasize scientific expertise
- The causal framework as stated in the Preamble to the ISAs, and that has been reviewed by 11 CASAC panels and 74 experts, should be retained
- and others

Today, you should ask: do we have the necessary expertise in all of the most critical scientific disciplines to do this review? Clearly, the answer is no.

For example, you don't have epidemiologists yet epidemiology is a central scientific discipline for both ozone and PM. You lack relevant expertise for other aspects of the science for the health and welfare standards for ozone and PM. There needs to be adequate breadth, depth, and diversity of scientific viewpoints to deliberate on complex matters. We illustrate a few examples in our letter.

The chair should allow members to deliberate on whether to recommend formation of an ozone review panel and reinstatement of the PM review panel. These panels should be convened by EPA and CASAC as soon as possible.

At CASAC's meeting on Nov 29 regarding the ozone Integrated Review Plan, a member suggested that the CASAC unanimously recommend the formation of an ozone review panel. The chair did not allow the CASAC to deliberate on this point. Thus, CASAC's letter to the Acting Administrator regarding the ozone IRP is silent on this issue. CASAC should address the need to form an ozone review panel and reinstate the PM review panel.

I'll be happy to answer questions.

Thank you.