

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

Reinstate the CASAC PM Review Panel

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I am a past chair of CASAC and have served on 10 CASAC review panels.

17 members of the arbitrarily and capriciously disbanded CASAC PM Review Panel submitted a consensus letter.¹ Our group has more breadth, depth, and diversity of expertise than this CASAC, and includes nationally and internationally recognized scientists who are leaders in their fields. We reiterate 8 major findings and 44 recommendations of our December 10 letter.² Since that time, nothing has changed to restore the quality, credibility, and integrity of the scientific review process or the CASAC itself. We also offer our consensus findings on the Draft

¹ Frey, H.C., A.V. Diez Roux, P. Adams, G. Allen, J. Balmes, J.C. Chow, D.W. Dockery, J.R. Harkema, J. Kaufman, D.M. Kenski, M. Kleinman, R. McConnell, R.L. Poirrot, J.A. Sarnat, E.A. Sheppard, B. Turpin, and S. Vedal, "03-07-19 Draft CASAC Review of EPA's Integrated Science Assessment (ISA) for Particulate Matter (External Review Draft – October 2018). 19 page letter submitted to Chair, Clean Air Scientific Advisory Committee, U.S. Environmental Protection Agency, Washington, DC, March 27, 2019.
[https://yosemite.epa.gov/sab/sabproduct.nsf//A491FD482BB83BEE852583CA006A2548/\\$File/Written+Comment+from+17+Members+of+the+CASAC+PM+Review+Panel+that+was+Disbanded+on+October+11+2018+rev.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf//A491FD482BB83BEE852583CA006A2548/$File/Written+Comment+from+17+Members+of+the+CASAC+PM+Review+Panel+that+was+Disbanded+on+October+11+2018+rev.pdf)

² 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. Poirrot, 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)

ISA and of process and scientific deficiencies of CASAC's draft letter. I also submitted individual comments.³

CASAC's draft letter unfairly mischaracterizes the work of the EPA staff. The staff have prepared a comprehensive, systematic review that follows well-established principles and operational terminology. The Draft ISA is scientific and policy relevant.

Process

- The high rate of turnover of CASAC, coupled with disbanding of the PM Review Panel and other deficiencies, is manifesting predictable problems of inexperience and lack of breadth, depth, and diversity of expertise.
- CASAC should read and follow the Integrated Review Plan.⁴
- The ISA should include a holistic review of policy-relevant studies,⁵ not arbitrary rules for throwing out studies.
- EPA should follow four decades of precedent to augment CASAC with the experts it needs, consistent with its charter.⁶ It should reinstate the CASAC PM Review Panel. It should not engage in ad hoc and post hoc approaches to cherry-picking experts.

CASAC

- CASAC claims that the ISA and its key references are unscientific. This is wrong.
- CASAC members: your name and reputation go with this letter.
- Lack of needed expertise, coupled with motivational biases, undermine the credibility of CASAC advice on causal determination and many other issues.
- Robust expert judgment requires conditioning based on breadth, depth, and diversity of scientific expertise. This is lacking from the CASAC. The CASAC PM Review Panel meets this critical need.
- CASAC should not engage further in this review until it is augmented with the reinstated CASAC PM Review Panel.

³ Frey, H.C., "Public Comment: Deficiencies of Procedure and Expertise Must Be Corrected," Written Comment to the Clean Air Scientific Advisory Committee, U.S. Environmental Protection Agency, Washington, DC, March 26, 2018.
[https://yosemite.epa.gov/sab/sabproduct.nsf//46BBA443B9D953A9852583C9004F1F00/\\$File/Frey+Written+Public+Comments+to+CASAC+190326+Final.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf//46BBA443B9D953A9852583C9004F1F00/$File/Frey+Written+Public+Comments+to+CASAC+190326+Final.pdf)

⁴ U.S. EPA, Integrated Review Plan for the National Ambient Air Quality Standards for Particulate Matter, U.S. Environmental Protection Agency, Washington, DC, EPA/452/R-16/005, 2016.
<https://www3.epa.gov/ttn/naaqs/standards/pm/data/201612-final-integrated-review-plan.pdf>

⁵ U.S. EPA. Preamble to the Integrated Science Assessments (ISA). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-15/067, 2015. <https://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=310244>

⁶ United States Environmental Protection Agency Charter, Clean Air Scientific Advisory Committee, Filed with Congress June 5, 2017,
[https://yosemite.epa.gov/sab/sabproduct.nsf/WebCASAC/2017casaccharter/\\$File/CASAC%202017%20Renewal%20Charter%20Filed%206-5-17.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/WebCASAC/2017casaccharter/$File/CASAC%202017%20Renewal%20Charter%20Filed%206-5-17.pdf)