



**EPN Comments on the Draft CASAC Comments on
EPA ISA Supplement and Policy Assessment
for Particulate Matter
February 25, 2022**

To: EPA Administrator Michael Regan and the Clean Air Scientific Advisory Committee (CASAC):

I'm John Bachmann speaking for the Environmental Protection Network.¹ I worked in EPA's Air Office for 33 years in Science/Policy, with a lead role in all reviews of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM) through 2006.

First, as a veteran of the NAAQS process, it has been refreshing to witness a return to a CASAC and consultants competent in all relevant disciplines as they engage in productive discussions and review of these documents. The combination of former and new panelists worked well and brought additional insights, for example in discussing sensitive populations.

Second, we agree with the unanimous conclusion of CASAC and consultants that the current suite of PM_{2.5} standards is not sufficient to protect public health. We believe the majority of CASAC members got it right in their draft letter recommending strengthening both the annual and daily primary standards to levels with a range of 8 to 10 ug/m³ annual and 25 to 30 ug/m³ daily.

Based on a number of recent studies, we believe a 10 ug/m³ annual standard would provide little or no margin of safety and favor the low end of the range. As stated in [our December 2021 written comments](#), we place more emphasis on the evidence as opposed to the risk assessment. Because, as Dr. Boylan noted, average annual levels in the US are already at 8 ug/m³ or below, it is likely only a limited number of areas would experience meaningful risk reductions at 10 ug/m³. More importantly, a substantial number of credible US and Canadian studies found effects at lower mean levels. The CASAC majority was correct in noting the problem with discounting risk to individuals exposed at the design value monitor while pointing to protection for the average.

We also agree with the majority's rationale in placing the main emphasis on evidence-based information rather than on the risk assessment in recommending stronger daily standards. As detailed in our December comments, we also agree that a harder look at implications of controlled human exposures at lower levels favors strengthening the current standard. In fact, we believe these studies may support consideration of alternative short-term exposure goals in the Air Quality Index.

Finally, CASAC notes the supplemental review's compressed timeframe as problematic and recommends this not be the future norm. EPN certainly agrees, but we are concerned this procedural recommendation could be misconstrued as implying the current review's substance and CASAC's advice are less than adequate. CASAC is not asking to see second drafts of the documents, and should clarify that once EPA addresses their major comments and recommendations, the final ISA supplement and PA are adequate for rulemaking, and they and CASAC's advice deserve the Administrator's full and careful consideration.

¹ EPN is a volunteer organization of over 550 former EPA employees and others concerned about public health and the environment.