4-5-22 Preliminary Draft Comments from Members of the 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 Do not cite or quote.

1 2	Preliminary Comments from Dr. James Boylan on EPA's Integrated Review Plan for the National Ambient Air Quality Standards for Lead.
3	Volume 2: Planning for the Review and the Integrated Science Assessment (March 2022)
4	
5	4-5-22
6	
7	
8	Included in the ISA are causality determinations that are then used in the risk and exposure
9	assessment (REA) and policy assessment (PA) documents. The causal determination framework
10	proposed by EPA is based on weight-of-evidence and professional judgement leading to
11	conclusions than can't be replicated by other scientists.
12	
13	For example, the 2018 draft ISA for PM found that there was a "likely to be a causal"
14	relationship between long-term PM _{2.5} exposure and nervous system effects; between long-term
15	ultrafine particulate (UFP) exposure and nervous system effects; and between long-term PM _{2.5}
10	exposure and cancer. However, the CASAC letter dated April 11, 2019 to Administrator wheeler
l /	stated, "the CASAC finds that the Draft ISA does not present adequate evidence to conclude
18	that there is likely to be a causal relationship between long-term PM2.5 exposure and nervous
19	system effects; between long-term ultrafine particulate (UFP) exposure and nervous system
20	effects; or between long-term PM2.5 exposure and cancer. This is an example of two different
21	groups of scientists looking at the same evidence and coming to different conclusions on the
22	between long term ultrafine nerticulate (LED) exposure and nervous system effects should be
23 24	changed from "Likely to be Causel Polationship" to "Suggestive of but not Sufficient to Infor. a
2 4 25	Causal Relationship" This is an example of the same group of scientists looking at the same
25 26	evidence and coming to a different conclusion
20 27	evidence and coming to a different conclusion.
27	The 2019 CASAC recommendation that a "more explicit systematic and transparent process"
20	be used for determining causal relationships resulted in the National Academies of Sciences
30	Engineering and Medicine (NASEM) committee on "Assessing Causality from a
31	Multidisciplinary Evidence Base for National Ambient Air Quality Standards " which is
32	currently in deliberations (https://www.pationalacademies.org/our-work/assessing-causality-
33	from-a-multidisciplinary-evidence-base-for-national-ambient-air-guality-standards). EPA should
34	review the findings of the NASEM committee and incorporate any recommended changes into
35	their causal determination framework prior to developing the draft ISA for Pb.
2	1

36