

Andrew Wheeler

Acting Administrator

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue NW, Washington, DC 20460

RE: Proposed changes to Clean Air Scientific Advisory Committee (CASAC) review process

December 10, 2018

Acting Administrator Wheeler:

We write as past members of the Clean Air Scientific Advisory Committee (CASAC) of the Science Advisory Board of the US Environmental Protection Agency (EPA) to express concern about the announced approach for CASAC review of the National Ambient Air Quality Standards (NAAQS), which eliminates the comprehensive peer review process that evaluates evidence related to the NAAQS and replaces the process with a single seven-person panel, comprised of the Charter CASAC members. Several of those signing this letter have served as Chair of CASAC (Samet, Frey, Hopke, Diez Roux), and we have expertise in the health effects of air pollution, coming from our research and patient care activities, as well as a range of disciplines pertinent to the NAAQS review. As a primary concern, we are united in suggesting that a seven-person panel cannot review and evaluate the documents prepared by the Agency in the process for consideration of revisions to the NAAQS. We are deeply concerned that eliminating the CASAC panels will lead to superficial reviews that will not have the needed scientific depth. The Charter CASAC, simply based on its number, cannot span the scope of science considered by the EPA as it guides the Administrator in assuring that the NAAQS will protect human health with an adequate margin of safety, as mandated by the Clean Air Act. Furthermore, for the current ozone and particulate matter reviews, the EPA is proposing a rushed schedule, which will reduce transparency, opportunity for public input, and the quality of the review.

Those signing this letter are in agreement that the CASAC peer review process was not “broken”; quite to the contrary, an effective process had been established that led to high-quality and timely peer review that has directly informed NAAQS revisions. Scientific evidence has been the foundation for NAAQS revision and peer review is fundamental to the translation of scientific evidence into standards to protect the public health. The CASAC panels have typically included 14-15 members beyond the Charter CASAC to have the full range of expertise needed to cover the Integrated Science Assessment (ISA), Risk and Exposure Analysis (REA), and Policy Analysis (PA) documents. The range of topics to be covered includes atmospheric sciences, exposure sciences, toxicology, epidemiology and statistics, risk assessment, and

ecological and human welfare effects. For the most critical areas, such as epidemiology, several expert panel members have been included in the pollutant-specific review panels.

With these numbers and breadth of expertise, CASAC panels have provided comprehensive reviews that are then summarized by the CASAC Chair and approved by the Chartered CASAC before transmittal to the Administrator. CASAC has been augmented with additional expert scientists to form review panels for over three decades. The role of the Charter CASAC, and additional scientists added to complete pollutant-specific panels, is well specified in the series of documents developed by the EPA in support of NAAQS revision (see Figure 1 below from the 2013 ISA for Ozone). CASAC has recognized that the EPA documents need to be adequate for their intended purpose. In our experience, peer review by CASAC has resulted in substantial revisions by the EPA. In the past, CASAC typically provided two cycles of peer review per document, as each document was revised in response to CASAC comments.

We are deeply concerned that eliminating these levels of peer review and expertise will deprive the EPA of essential, independent scientific guidance that is needed to set NAAQS that are protective of human health. We request the opportunity to speak with the EPA's leadership on the process by which CASAC provides scientific input to the agency as the NAAQS are revised. Collectively, we have provided years of service to the agency on CASAC and its panels. We are hopeful that the tradition of assuring the best possible peer review will be maintained.

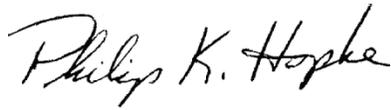
Sincerely,



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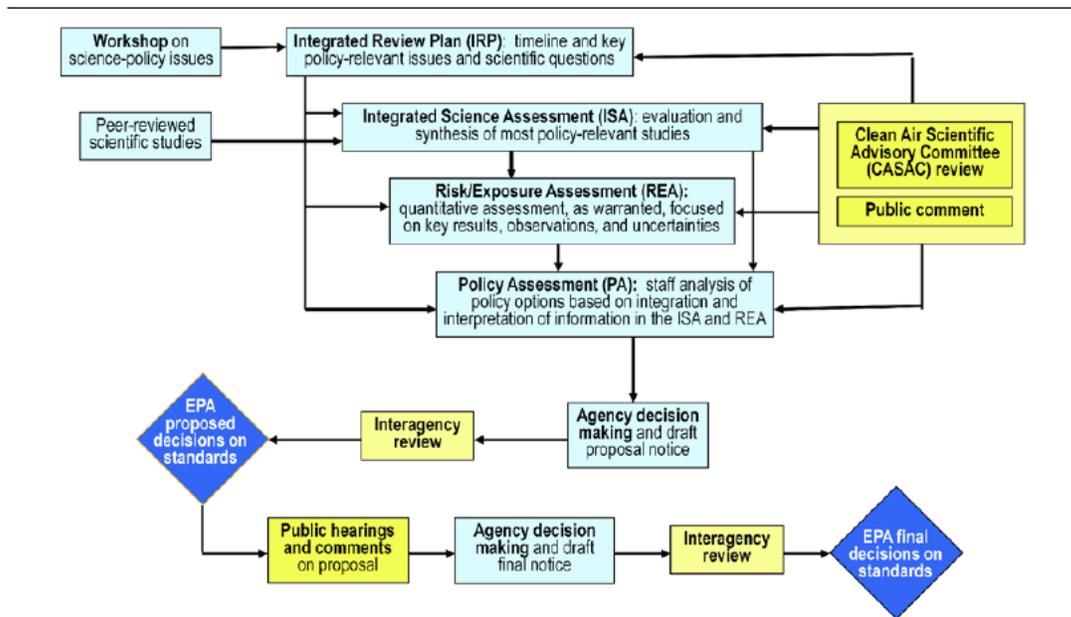


Figure 1 Illustration of the key steps in the process of the review of National Ambient Air Quality Standards.