

EPN Summary of Letter to CASAC from Former Members of 2009-2015 CASAC Ozone Review Panel “CASAC Advice on EPA’s Review Plan for the Ozone NAAQS” November 26, 2018

The Environmental Protection Agency (EPA), without consulting with the Chartered Clean Air Scientific Advisory Committee (CASAC) or the public, has made several preemptive changes to the process for reviewing and revising the National Ambient Air Quality Standards (NAAQS) review process. These changes harm the quality, credibility, and integrity of the CASAC and the NAAQS science review process, which are critical to protecting public health and the environment.

On July 27, 2018, EPA called for nominations for an Ozone Review Panel, a dozen or so highly skilled experts that aid in the assessment of ground-level ozone limits. Under the Clean Air Act, EPA is required to carry out periodic reviews and revisions of the scientific criteria and standards for six air major air pollutants including ozone. Health impacts from ozone outlined on [EPA’s website](#) include inflaming and damaging airways; aggravating lung diseases such as asthma, emphysema and chronic bronchitis; and increasing the frequency of asthma attacks.

On October 10, 2018, with no opportunity for input, or reasonable explanation, EPA decided not to form an Ozone Review Panel. Instead, Acting Administrator Wheeler [tasked](#) the seven-member CASAC with leading the review of key scientific assessments for the Ozone NAAQS and announced new members to CASAC. In response, former chairs and members of the chartered 7-member CASAC and members of the CASAC Ozone Review Panel from the 2009 to 2015 review of the primary and secondary NAAQS for ozone wrote a [letter](#) to current Chair of CASAC Dr. Louis Anthony (Tony) Cox. including seven findings and thirty recommendations.

The major findings in the letter include:

- The myriad of changes to the NAAQS review process are collectively harmful to the quality, credibility, and integrity of the scientific review process and CASAC as an advisory body.
- The current 7-member CASAC does not have the depth or breadth of expertise needed for the ozone review, nor could a group of this size cover the needed scientific disciplines.
- The late 2020 deadline for completing the ozone review does not provide sufficient time to complete the “thorough review” of the “latest scientific information” of the “kind and extent” of “all identifiable effects” mandated by the Clean Air Act for the review of NAAQS, even if the committee were supported by a robust panel of experts in the multiple disciplines involved.
- CASAC has transitioned from a committee of nationally and internationally recognized researchers at the leading edge of their fields toward a committee composed predominantly of stakeholders chosen based on geographic location and affiliation with state government, rather than scientific expertise first and foremost. The statute requires only “one person representing State air pollution control agencies.”

The major recommendations include:

- The CASAC should recommend that the EPA rescind the October 31, 2017 and May 9, 2018 memoranda by former Administrator Scott Pruitt. [The October 31, 2017 memo fundamentally changes the chartered CASAC from a scientific advisory committee to a stakeholder committee, and the May 31, 2018 memo fundamentally transforms the NAAQS review process from a thorough to a cursory review of the science.]
- The CASAC should recommend that EPA provide CASAC with draft assessment documents in the proper sequence, with enough time between documents to allow for advice from the CASAC Ozone Review Panel (via the CASAC) to be incorporated before proceeding to the next document.
- The CASAC should recommend that EPA allow for the likelihood that revised drafts of any of these documents will need to be reviewed a second time before the CASAC Ozone Review Panel, via the CASAC, would be able to provide closure on its advice.
- CASAC should immediately call for the formation of an Ozone Review Panel and for the reinstatement of the CASAC PM Review Panel.

More information about the Ozone and Particulate Matter Review Panels [here](#).

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