

**EPN Summary of Letter to CASAC from Former Members of
2015-2018 CASAC Particulate Matter Review Panel**
“CASAC Advice on EPA’s Review Plan for the Particulate Matter NAAQS”
December 10, 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.

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 particulate matter (PM). [EPA’s website](#) states that “Numerous scientific studies have linked particle pollution exposure to a variety of serious health effects, including: premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated [asthma](#), decreased lung function, and increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing. People with heart or lung diseases, children, and older adults are the most likely to be affected by particle pollution exposure.”

On October 10, 2018, with no opportunity for input, or reasonable explanation, EPA decided to disband the Particulate Matter Review Panel. Acting Administrator Wheeler [tasked](#) the 7-member CASAC with leading the review of key scientific assessments for the PM NAAQS and announced new members to CASAC. In response, 15 members of the disbanded PM review panel, including 8 former members of the chartered CASAC, and 2 former chairs of CASAC, wrote a [letter](#) to the current Chair of CASAC Dr. Louis Anthony (Tony) Cox, including 8 findings and 44 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 particulate matter review, nor could any group of this size cover the needed scientific disciplines.
- The late 2020 deadline for completing the PM 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.

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 9, 2018 memo fundamentally transforms the NAAQS review process from a thorough to a cursory review of the science.]
- The CASAC should recommend that EPA allow enough time for the PM review, including time for EPA to develop and CASAC to review revised drafts of assessment reports and to complete assessments of science before proceeding to assessment of policy options.
- ...CASAC should remind the current Acting Administrator, that it has been long-standing practice, for four decades, to augment the 7-member CASAC with additional independent expert consultants, and this augmentation is essential to a high-quality review.
- ...CASAC should call for, the reinstatement of the CASAC PM Review Panel and the immediate formation of an Ozone Review Panel.

For more information about the Ozone and Particulate Matter Review Panels:

<https://www.environmentalprotectionnetwork.org/pm-testimony-and-related-documents/>

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