

Summary of Testimony for the Public Teleconference of the Chartered Clean Air Scientific Advisory Committee (CASAC) Written Comments of John Bachmann on behalf of the Environmental Protection Network

“The CASAC Draft Letter Shows that EPA Has Broken the PM NAAQS Review Process”

March 28, 2019

John Bachman spoke to the Clean Air Scientific Advisory Committee, representing the Environmental Protection Network (EPN), a volunteer organization of former EPA employees and others concerned about continuing protection of public health and the environment. John worked for EPA’s Air Office for 33 years, many of them as Associate Director for Science/Policy and New Programs. He was heavily involved in all reviews of the Particulate Matter (PM) National Ambient Air Quality Standards (NAAQS) through 2006.

EPN is commenting principally because EPA has wholly ignored the comments and recommendations made both prior and at the December CASAC public meeting regarding the need to return the NAAQS review process to a sound, unbiased science and policy footing. In short, EPA management has broken the process and refused to fix it, which presents numerous logistical, technical and legal impediments for moving forward towards completion of the review by the end of 2020.

EPN’s main points include:

1. The process the EPA Administrator has adopted for this review of the PM standards is fatally flawed. We see no way this seven-member CASAC can produce a coherent and credible scientific review of the relevant science or the adequacy of the standards themselves.
2. This small committee is deeply divided in their interpretation of the scientific information. While the chair developed -- and some members support -- the criticisms of EPA’s approach to determination of the likelihood of causal relationships between fine particle pollution (PM_{2.5}) and health effects, others support EPA’s findings and approach, which are consistent with CASAC reviews over the last decade.
3. EPN wholly agrees with the suggestion by CASAC member Mark Frampton regarding how the committee should proceed with respect to the draft letter: *“In order to provide the needed expertise in the review process, EPA should immediately re-appoint the PM review panel, and convene an additional CASAC public meeting to review and discuss the panel’s comments, before CASAC finalizes its advice on the current draft ISA.”*
4. By changing the NAAQS process, eliminating the full panel and appointing new members without experience in CASAC NAAQS reviews, EPA management ignored the advice provided by CASAC and commitments made by EPA in the review of 2016 the Integrated Review Plan for PM.
5. EPN agrees that, while waiting to see if the agency takes the steps needed for a valid peer review of the Integrated Science Assessment (ISA) by a qualified CASAC panel, EPA should sift through such individual comments as it has and begin to address them as warranted to improve the current draft.

For all of these reasons, action must be taken to rectify this understaffed and divided committee that lacks the expertise, experience, and balance needed to ensure the quality and credibility of the NAAQS review process.