

SUMMARY

EPN Comments on the Draft EPA Policy Assessment of Particulate Matter

November 12, 2019

On November 12, 2019, EPN submitted [comments](#) on EPA's draft Policy Assessment (PA) of the scientific basis for the National Ambient Air Quality Standard (NAAQS) for particulate matter (PM). The Clean Air Act (CAA) requires EPA to set standards for common air pollutants that are harmful to public health and the environment, and periodically review the standards and the science on which they are based. Recent research suggests that the existing limits for fine particles in the air need to be tightened to adequately protect public health. EPN's review found that EPA's first draft of the Policy Assessment was well done, but should be revised to consider relevant comments from two groups of external science review panels. The EPN comments also found that poor decisions by EPA management resulted in serious problems in the development and peer review of the draft Particulate Matter Policy Assessment.

Last fall, EPA Administrator Andrew Wheeler disbanded a twenty-member scientific panel that was supposed to assist the independent Clean Air Scientific Advisory Committee (CASAC) with added expertise in reviewing the PM standard. He then tasked the seven-member CASAC to serve as the sole body to review the key scientific assessment for the NAAQS PM review on an expedited review timeline. He refused a request by the CASAC to bring back the panel, as well as its recommendation that an earlier science assessment document be revised and reviewed again. After the administrator disbanded the PM panel, these experts got together and formed the [Independent Particulate Matter Review Panel](#) (IPMRP) to review both the science and policy assessment documents and send their advice to EPA and the CASAC.

EPN's review of the current PM review process and the draft process found:

- The result of the current review process is an inadequate peer review of the science and standards in the PA. The CASAC has admitted it does not have the breadth or depth of expertise needed for this review. This lack of expertise and steps taken to speed the review have placed meeting an arbitrary deadline over the quality of review. These actions have resulted in a divided CASAC that debates scientific issues in disciplines not represented on the panel, and forced EPA to develop a Policy Assessment before the science is settled.
- CASAC should advocate for a sound science review process before proceeding. EPA should reinstate the PM review panel to review a new draft of the 2018 draft science assessment. After that, the CASAC and panel should review a second draft of the PA. Unless the process changes, EPA will have difficulties in relying on a divided CASAC's advice in defending whatever decisions the EPA administrator ultimately makes on the standards.
- EPA staff should be commended for a quality first draft, but should consider revisions. EPN agrees that the new evidence summarized supports the PA conclusions that the current fine particle standards are not adequate to protect health and also recommends some revisions and additions as well as consideration of relevant comments of the IPMRP and the CASAC.

Background

The CAA requires that EPA periodically review the latest scientific information relevant to assessing NAAQS pollutants like particulate matter, as well as the standards themselves. Based on this review, EPA must decide whether the existing NAAQS are adequate to protect public health and welfare, and revise them as appropriate. To ensure that these reviews meet the highest scientific standards, the Act established the seven-member independent CASAC. For the last four decades, EPA has supplemented the CASAC with a panel of leading experts on the health and environmental effects of the specific pollutants, like PM, that are under review.