

**Public Comments by Roy Gamse on EPA's Proposed Action on National Ambient Air Quality Standards for Particulate Matter**

No. EPA-HQ-OAR-2015-0072

May 20, 2020

My name is Roy Gamse. I am testifying today for personal and professional reasons.

On a personal level, I am concerned about EPA's determination of the health protective level of particulate matter air quality because I have been diagnosed with heart disease, and I have family members with asthma. Both conditions put us in groups more likely to be affected by particulate matter concentrations that would continue to be condoned by the proposed EPA standard. For the protection of my family and myself, I implore EPA to follow the Clean Air Act statute to the letter and set particulate matter standards that will protect our health.

On a professional level, I am deeply disturbed by the process used by EPA not only to cherry-pick the data to be considered in setting this standard, but also to cherry-pick the so-called experts whose advice to consider in making the decision. I say this as a former EPA Deputy Assistant Administrator who was responsible for the Agency's regulation-development process. I served EPA in the Nixon, Ford, Carter, and Reagan Administrations. I personally never observed the willful ignoring of scientific evidence that is apparent in Administrator Wheeler's handling of this decision.

This isn't that complicated. The Clean Air Act requires that EPA rely on the best scientific information when setting air quality standards to protect public health with an adequate margin of safety. Relying on the best scientific information requires having the data identified and assessed by the most qualified scientists with expertise in the relevant fields. EPA has not done that.

Instead the Administrator disbanded the group of experts on the health effects from particulates and relied on a CASAC group, which admittedly did not have the specialized expertise which had been jettisoned by the Administrator's action. That group could not reach a consensus recommendation, with those members with the most relevant scientific expertise objecting to the unfounded position of the CASAC chair.

In the meantime, the group of scientists dismissed by the Administrator, driven by a true sense of professionalism, was convened by the Union of Concerned Scientists, an independent nonprofit with no vested interest. This "Independent Particulate Matter Review Panel" developed recommendations based on the best scientific evidence.

So what did the Administrator do when faced with three sets of recommendations:

- The advice of EPA's career staff, which included scientists with knowledge and expertise in the relevant areas of research;
- The advice of the Independent Particulate Matter Review Panel, which included scientists with knowledge and expertise in the relevant areas of research; and
- The advice of the Chair of a divided CASAC group, which did not have the expertise of the EPA staff or the Independent Particulate Matter Review Panel?

You know the answer; he took the non-consensus advice from the least-qualified source, his hand-picked CASAC group.

In my ten years of involvement in the EPA regulation-development process and my five years of responsibility for that process, I have never seen anything like this: ignoring the Clean Air Act requirements for air quality standards based on the best scientific evidence with an adequate margin of safety. By making the decision ignoring the best scientific evidence and the best scientific experts, the Administrator has proposed a standard which is directly refuted by the best research and with no margin of safety. *In fact, the EPA proposal has a negative margin of safety!*

You are hearing from many scientists and health effects experts in this hearing, and the evidence on the record is clear. Follow their advice. Follow the Clean Air Act's statutory requirements.

I endorse the American Lung Association's recommendations to strengthen the annual PM 2.5 standard to 8 micrograms per cubic meter and the 24-hour standard to 25 micrograms per cubic meter.