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Comments from

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On the
**Draft CASAC Review of the EPA's
Integrated Science Assessment for Particulate Matter
External Review Draft – October 2018**

March 28, 2019

Thank you for the opportunity to share the comments from the American Lung Association with the Committee. I am Al Rizzo, a pulmonologist and Chief Medical Officer for the Lung Association. We will submit longer written comments as well.

For decades, the American Lung Association has closely followed and participated in the reviews of the research into the health effects of the criteria pollutants. We have generally supported the CASAC in its reviews, valuing the thoughtful insights and careful questions that the members raised to provide to EPA the strongest scientific basis for its decisions about the NAAQS. We value the core purpose under the Clean Air Act for this process: to set air quality standards that protect public health with an adequate margin of safety.

The importance of this task makes this Committee's draft response to the PM ISA especially troubling. Here are just two of the comments on the first page that are incorrect and should be removed:

- The claim that there is no "comprehensive or systematic assessment of the science" despite nearly 1900 pages that examine in depth more than 2,000 studies.
- The claim that the ISA does not "follow widely accepted scientific methods for deriving . . . conclusions" when the ISA follows the process used by the National Academy of Sciences to determine causality in their reviews and followed for years by prior CASACs.

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This draft letter's exaggerated, inaccurate arguments about process and rationale for determining causality misrepresents the structured, reasoned approach that the CASAC has historically followed and that the EPA staff followed in compiling this assessment. Without getting into more details here, we agree with the Committee that the members desperately need the assistance of the PM expert panel that had been working with the prior CASAC to develop the plan for this review and to assist in assessing the science. As we noted in our comments in December, no seven people could be expected to review and assess this much information alone, especially lacking key experience in epidemiology and other expertise for this review.

We note that, fortunately, some CASAC members clearly disagreed with the draft conclusions included in this letter. We urge the entire Committee to recognize that the conclusions in the ISA, especially about the causality of premature death, reflect the well-vetted, long established conclusions also reached in other CASAC, other national and international reviews.

As I stated in December, we have recommendations for improvements to the ISA, and support CASAC's request for a second draft. We urge EPA to reinstate the former PM panel to assist this Committee to better review these studies. Most critically, we urge this Committee to recognize that the overall approach and thorough review of the studies in this ISA are fundamentally sound.

Thank you.

