



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 25, 2019

THE ADMINISTRATOR

Louis Anthony Cox, Jr., Ph.D.
Chair, Clean Air Scientific Advisory Committee
Science Advisory Board
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Dr. Cox:

Thank you and the members of the Clean Air Scientific Advisory Committee for your comments on *EPA's Integrated Science Assessment for Particulate Matter (External Review Draft - October 2018)*, hereafter referred to as the draft PM ISA. My staff and I appreciate the thorough and constructive comments provided by the CASAC during its public meeting on December 12-13, 2018, public teleconference on March 28, 2019, and in your letter dated April 11, 2019, which contained the CASAC's consensus responses to the agency's charge questions and individual review comments from its members.

My staff and I are carefully considering your comments and recommendations, as well as the comments we received from the public. I would like to provide you with an update on our progress in responding to those comments and recommendations as well as our path forward. As you know, CASAC's advice plays a critical role in the process of evaluating the science underpinning our National Ambient Air Quality Standards under the *Clean Air Act*, including whether existing standards are requisite to protect the public health with an adequate margin of safety as well as other statutory questions.

The CASAC has raised a number of important issues with the draft PM ISA. In addition to offering numerous consensus and individual comments on particular scientific issues, the CASAC has requested that the agency incorporate significant changes to our documentation procedures. As noted in your letter, the CASAC finds that the draft PM ISA "does not provide a sufficiently comprehensive, systematic assessment of the available science relevant to understanding the health impacts of exposure to particulate matter." Some of these comments and adjustments can be addressed in the near term, while others will require additional time to complete.

The process outlined in the EPA's May 9, 2018, "Back-to-Basics" memo directs the agency to ensure that NAAQS reviews are completed in a timely, efficient and transparent manner, consistent with the CAA. The five-year review cycle for each NAAQS is challenging in light of the continuous development of new and relevant science, challenges compounded by the EPA

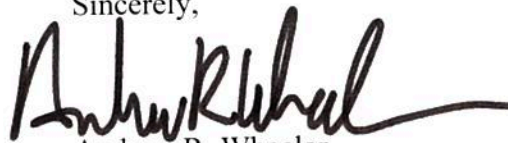
practice of facilitating CASAC and public engagement throughout the process. With this in mind, I have directed my staff to do the following:

1. Complete the review of the PM NAAQS by the end of 2020. The difficulty of this task is not lost on me, and I recognize that the CASAC has raised concerns regarding the limitations of the current draft PM ISA. I have asked that staff maintain their focus on meeting our statutory deadlines while reflecting the latest scientific information in a final PM ISA. In practical terms, this means:
 - Based on initial feedback from the CASAC and while making necessary adjustments to the draft PM ISA, keep production of the PM Policy Assessment, including relevant exposure and risk assessment work, on schedule for delivery to the CASAC in the fall of 2019 to facilitate simultaneous review of the PA by CASAC and the public by the end of the calendar year.
 - By the end of 2019, incorporate the CASAC's comments and recommendations, to the extent possible, and create a final PM ISA so that it may be available to inform a proposed decision on any necessary revisions of the NAAQS in early 2020.
 - For those comments and recommendation that are more significant or cross-cutting and which cannot be fully addressed in this timeframe, develop a plan to incorporate these changes in future PM ISAs as well as ISAs for other criteria pollutant reviews.
2. Continue progress on the review of the NAAQS for ground-level ozone through production of the draft ozone ISA and accelerating the development of a draft ozone PA so that both documents can be delivered for CASAC and public review by October 2019. This simultaneous review by the CASAC and the public should conclude by the end of the calendar year.
3. Create a pool of subject matter expert consultants that the seven-person chartered CASAC, through the chair, will draw from as needed to support its PM and ozone reviews. The consultants will make themselves available as requested to provide feedback on the scientific and technical aspects of science and policy assessments and related documents. Each consultant's feedback will help the chartered CASAC as it provides advice to me in a manner consistent with the *Federal Advisory Committee Act* and the CAA. Requests for feedback from these consultants should be submitted in writing through you, the CASAC's chair, and the CASAC's designated federal official. The agency plans to solicit public nominations for this pool of consultants, and these individuals should be available to the CASAC no later than August 31, 2019.

I believe that sound science must be the foundation upon which all the EPA's regulatory and policy decisions are based. Independent reviews such as yours help ensure that the agency uses the best available science to fulfill its mission to protect human health and the environment. It is important for everyone to remember that the *Clean Air Act* envisions a continual NAAQS review. As soon as one five-year review ends, the next five-year review begins. The agency will

be constantly reviewing the latest science for each NAAQS review. Thank you for your hard work and thoughtful review of the Draft PM ISA. I look forward to regular interaction with the CASAC as the agency continues to meet its statutory mandate to regularly review and, as necessary, update each NAAQS.

Sincerely,



Andrew R. Wheeler