

**Criteria Pollutants Committee Co-Chairs’  
Suggested Outline of NACAA Comments on  
EPA’s Proposed PM NAAQS Decision**

**For NACAA Membership Discussion on Monday, June 1, 2020<sup>1</sup>  
1:00-3:00 PM Eastern Time  
(866) 365-4406, 2682624#**

- I. Introduction and Overview of EPA Administrator Wheeler’s Proposal to Retain Current PM NAAQS Without Revision
- II. PM NAAQS Review Process Issues: Adequate Expertise and Time Were Not Provided Resulting in Flawed Process
  - a. Administrator Wheeler Disbanded CASAC PM Review Panel in October 2018
  - b. CASAC Requested that PM Panel Be Reconvened Citing CASAC Members’ Need for Additional Expertise
  - c. Administrator Wheeler Did Not Reconvene Panel
  - d. EPA’s May 2018 “Back-to-Basics Process for Reviewing the NAAQS” Called for Completion of PM NAAQS Review by December 2020 and Identification of “Efficiencies” in the Review Process
  - e. CASAC’s Requests for Additional Drafts of Key Documents Were Declined in Order to Save Time
  - f. All of the Above Contributed to a PM NAAQS Review Process that Was Fundamentally Flawed
- III. CASAC Did Not Consider the Best Available Science
  - a. Clean Air Act Requires CASAC to Consider Best Available Science in Making Recommendations
  - b. Latest Science Considered Was from January 2018
  - c. Since January 2018 Numerous (~10) New Robust Studies Have Been Published; Together These Studies Demonstrate Strong Causality Between Exposure to PM at Levels Below the Current Standards and Mortality
- IV. CASAC’s New Criteria for What Is Considered “Causal” Has Adverse Long-Term Impacts
  - a. New Framework Sets Bar So High That Future NAAQS Could No Longer Be Based on Epidemiological Studies
- V. No Consensus on Recommendations but Highly Credible Parties Recommend That PM<sub>2.5</sub> Standards Be Strengthened

---

<sup>1</sup> EPA’s comment deadline for this proposal is June 29, 2020. Given this tight deadline and NACAA’s comment process requirement for seven business days for members’ review of draft comments we will need to begin drafting any NACAA comments immediately after the June 1 call. Therefore, we will need your input on this outline on or by the June 1 call. Please provide any comments in advance of the call, in writing by 10:30 AM Eastern on June 1, to Nancy Kruger at [nkruger@4cleanair.org](mailto:nkruger@4cleanair.org) and she will share them with the Criteria Pollutants Committee Co-Chairs, Tad Aburn (MD) and Wayne Nastri (Los Angeles, CA).

- a. Administrator's Recommendation Is Consistent with the Recommendation of Only Five Members of CASAC
  - b. Two Members of CASAC Recommend Strengthening Annual PM<sub>2.5</sub> NAAQS
  - a. EPA Staff, In Its Final Policy Assessment, Advises Administrator that Available Information Suggests Tighter Annual Primary PM<sub>2.5</sub> Standard in Range of 8 µg/m<sup>3</sup> to <10 µg/m<sup>3</sup> (Versus Current Standard of 12 µg/m<sup>3</sup>) Is Supported and Tighter 24-Hour PM<sub>2.5</sub> Standard as Low as 30 µg/m<sup>3</sup> (Versus Current Standard of 35 µg/m<sup>3</sup>) Is Supported
  - b. Independent PM Review Panel Recommends Annual Primary PM<sub>2.5</sub> Standard Be Revised to Level Between 10 µg/m<sup>3</sup> and 8 µg/m<sup>3</sup> and 24-hour Primary PM<sub>2.5</sub> Standard Be Revised to Level Between 30 µg/m<sup>3</sup> and 25 µg/m<sup>3</sup>
- VI. Administrator's Proposal to Retain Current PM<sub>2.5</sub> NAAQS Without Revision Is Flawed
- VII. Conclusion: NACAA...
- ...opposes this flawed proposal?
  - ...cannot support this flawed proposal?
  - ...recommends that this flawed proposal be withdrawn?
  - ...other?

(5/28/2020)