Message

**From:** Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
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**Subject:** ORD's PM Assessment Advances, Sidestepping Air Office Official's Influence | InsideEPA.com

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# ORD's PM Assessment Advances, Sidestepping Air Office Official's Influence

EPA's Office of Research and Development (ORD) is completing work on the scientific document that will form the basis of the agency's review of its air quality standards for particulate matter (PM) after brushing aside efforts by a top air office political appointee who sought to raise doubts about the science, a departure from the usual process, EPA and other sources say.

During a briefing on the Integrated Science Assessment (ISA) for air office appointees, the official questioned whether ORD authors had sufficiently elucidated scientific uncertainties in some of the studies discussed in the ISA.

The official "didn't understand the ISA is an ORD document, not something that" air office appointees review, an agency source says.

By that point, ORD is "not looking for technical comments from policy people," a fact that was clarified, the source adds.

The dust up telegraphs the looming fight over EPA's pending review of its PM standards -- which are currently responsible for the bulk of federal regulatory benefits and which Trump administration officials and its supporters have long sought to scale back.

For example, many environmentalists are concerned that EPA's proposed science transparency rule, which bars the use of scientific research where the underlying data is not publicly available, would be used to target the science underlying PM standards.

They fear that mandating the use of such science would bar EPA from using studies like the Harvard Six Cities study, that have long been used **(/node/212783)** to justify strict PM

standards but would now be barred from use because the study participants' data is private medical data and not available for public review.

An EPA spokeswoman did not deny the claims but told *Inside EPA* that the agency, including the air and research offices, "is working to develop and assess the latest scientific and air quality information to facilitate meaningful feedback" by science advisors.

She said this process "is being conducted in a manner consistent with the Clean Air Act and the Agency's back-to-basics process" for reviewing air quality standards, and noted that the draft ISA and other documents related to the next review of the PM standard "have not been finalized or provided to EPA's advisors."

The Clean Air Act requires EPA to review its national ambient air quality standards (NAAQS) for criteria pollutants every five years and, based on a review of new science, ensure they are protective of human health and the environment with an "adequate margin of safety."

In a sign that the agency is anticipating a heated debate over its PM review, Clint Woods, the deputy air office chief, told a conference last month to expect a "robust" debate over the future of the fine PM (PM2.5) standard, which the agency last tightened in 2012 down to 12 micrograms per cubic meter (ug/m3) from the 2006 standard of 15 ug/m3.

Speaking at the Texas Environmental Superconference, Woods predicted some stakeholders will push for further ramping down the PM2.5 standard to as low as 5 ug/m3 as part of EPA's ongoing review of the limit, though he suggested such a limit might be technically impossible.

"I think there's a lot of those who think that science that has been developed since 2012 suggests that that standard needs to be in the single digits, and maybe as low as 5 [ug/m3], which is well below what any current monitor can measure," he said.

**PM review**

While the agency has long missed its statutory deadlines, EPA is on a fast track to complete separate rulemakings addressing PM and ozone by 2020 after then-Administrator Scott Pruitt issued a memo in May that accelerated the agency's previously planned schedules.

While Pruitt did not prescribe the scientific review and other steps the agency would take to meet that rulemaking deadline, in the case of the ozone review, he suggested a series of steps that could provide efficiencies for other reviews.

He also opened the door to changes in how some reviews are conducted, saying that the Integrated Science Assessments (ISA), Risk and Exposure Assessments (REA), and Policy Assessments (PA) "should focus on policy-relevant science and on studies, causal determinations, or analysis that address key questions related to the adequacy of primary and secondary NAAQS."

Nevertheless, the PM review appears to be following the past process, in which staff prepare separate scientific and policy reviews for consideration by agency advisers, who use them to provide recommendations to the administrator.

In accord with past practice, ORD has been preparing its ISA for peer review by the agency's Clean Air Scientific Advisory Committee (CASAC).

"The air office [is] not involved in the [ISA] document before it goes to review. That's been the precedent," says a knowledgeable source outside the agency.

But now, the source says, "It appears clear that the air office political leadership is doing that now. I'm not totally surprised. I've had the sense that staff is reviewing the 1,900 new studies since the last one and concluding that there are strong effects."

The appointees' requested changes to the draft PM ISA were not related to Pruitt's proposal last spring to bar the use of any scientific research where the underlying raw data are not publicly available, the source tells *Inside EPA*. Though environmentalists have indicated that EPA's toxics office has taken steps to begin to implement this draft rule in its assessments of chemicals' human health risks, the source says that is not the appointees' concern with the PM ISA.

Rather, their questions suggested, for example, in the case of a study using a large Medicare database and showing health effects associated with air pollution below the current standard, that "there's not enough comment surrounding the uncertainty," the source adds.

Agency sources corroborated the account, though one source indicates there is a way forward to address the appointees' concern, and the ISA remains on schedule for release.

Still, the source outside the agency has heard that "ORD is not happy about the contravention for the way that this is normally done. … Every impression I've got, they're not pushing to change the PM side, not to relax it because most places are in attainment. But they may be worried about interest in tightening it." -- *Maria Hegstad* (mhegstad@iwpnews.com)

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