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May 2, 2005

Dr. Willis Hughes
Chairman
Clean Air Scientific Advisory Committee
Department of Chemical Engineering
Clarkson University
8 Clarkson Street
Potsdam, NY 13699

Re: **CASAC Review of Preliminary Recommended Methodology for Coarse PM Health Risk Analysis**

Dear Dr. Hughes:

These comments are offered on behalf of the Coalition for Cleaner PM Life Regulation, with respect to the recent draft risk analysis methodology for coarse particulate matter (PM$_{10}$). The comments were prepared with the assistance of Dr. Terry Daniel, William Petrasky of Exponent, LLC, and Dr. John Richards of Air Control Techniques, Inc. Drs. Daniel and Richards both addressed the Committee at prior meetings on these issues.

Directly the Agency's briefing to discuss the draft methodology, several members of the Committee noted that "[a]lthough [a] number of the health effects and exposure data is available for use in a risk assessment for PM$_{10}$ ... [the Committee] strongly believes that the uncertainties in the PM$_{10}$ data are great" with respect to their qualitative nature, as evidenced by several qualitative assessment of potential risk Peer Review responses. This view was reported by the Committee at the first public review of PM Criteria Documents issued to date, and the draft risk assessment methodology does not include any detailed review, and of the suitability of the disease data for purposes of a quantitative risk assessment.

1/ See, e.g., "Preliminary Recommended Methodology for PM10 and PM 10-2.5 Risk Analysis," slide of Peter Chemerys, Health Effects Division, EPA (Feb. 28, 2005). The Committee cited the following comments: Second Meeting Transcript, Second Day, Tr. at 19-20 (Dr. Christiani); Dr. Fitzgerald, American Board of Medical Toxicology, Sixth Meeting, Clarkson Peer meetings, Attachment.