

Subject:Request to Discuss Integrity of 2019 EPA PM PA

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November 18, 2019

Re: Request to Discuss Integrity of 2019 EPA PM PA

Dear Critic of EPA CASAC,

Because you participated in the October 22, 2019 EPA CASAC Teleconference and criticized the April 11, 2019 CASAC Review of the 2018 Draft EPA PM ISA, I request that you read my detailed October 17, 2019 Comment that contains my criticism of the 2018 Draft EPA PM ISA and the 2019 Draft EPA PM PA ([https://yosemite.epa.gov/sab/sabproduct.nsf/F729E7D8E248A2C5852584970009565A/\\$File/Enstrom+Comment+to+CASAC+re+090519+EPA+PM+PA+101719.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/F729E7D8E248A2C5852584970009565A/$File/Enstrom+Comment+to+CASAC+re+090519+EPA+PM+PA+101719.pdf)). I presented strong evidence that 1) there is NO causal relationship between PM2.5 and total mortality in the US, 2) the PM PA cites 'positive authors' and omits 'null authors' and their criticism, 3) the PM PA does not address the PM2.5 deaths controversy, 4) my analyses of underlying data for four key US cohorts, including H6CS and ACS CPS II, support the need for the EPA Transparency Rule, and 5) the PM PA must be revised to incorporate the CASAC Review and the criticisms by me and others.

My Comment has just been supported by the 297-page November 13, 2019 Draft CASAC Review of the 2019 Draft EPA PM PA: "Overall, the CASAC finds that the Draft PM PA depends on a Draft Particulate Matter (PM) Integrated Science Assessment (ISA) that, as noted in the April 11, 2019, CASAC Report on 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 PM, due largely to lack of a comprehensive, systematic review of relevant scientific literature;

inadequate evidence and rationale for altered causal determinations; and a need for clearer discussion of causality and causal biological mechanisms and pathways. Given these limitations in the underlying science basis for policy recommendations, and diverse opinions about what quantitative uncertainty analysis and further analysis of all relevant data using the best available scientific methods would show, most CASAC members conclude that the Draft PM PA does not establish that new scientific evidence and data reasonably call into question the public health protection afforded by the current 2012 PM_{2.5} annual standard.”

[\(https://junkscience.com/2019/11/winning-epa-science-advisers-reject-epa-staff-particulate-matter-claims/\)](https://junkscience.com/2019/11/winning-epa-science-advisers-reject-epa-staff-particulate-matter-claims/)

Before the December 3, 2019 CASAC Meeting on the PM PA for the NAAQS, please send me your assessment of my criticism of the PM ISA and PM PA or indicate a willingness to discuss my criticism. If I receive no response from you, then I will assume that you consider my Comment to be entirely invalid and that you consider your Comment to be entirely valid.

Thank you very much for your consideration of this important request.

Sincerely yours,

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