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**Sent:** Monday, June 04, 2018 11:30 AM

**To:** 'George D. Thurston' <george.thurston@nyumc.org>

**Cc:** 'Genna Reed' <greed@ucsusa.org>; 'Jonathan M. Samet' <jon.samet@ucdenver.edu>; 'John D. Bachmann' <johnbachmann@bellsouth.net>; 'David C. McCabe' <dmccabe@catf.us>; 'Lynn R. Goldman' <goldmanl@gwu.edu>; 'Luke R. Tonachel' <ltonachel@nrdc.org>; 'Mary Berlik Rice' <mrice1@bidmc.harvard.edu>; 'Elizabeth A. Borkowski' <borkowsk@gwu.edu>; 'Jason A. Schwartz' <jason.schwartz@nyu.edu>; 'C. Arden Pope III' <cap3@byu.edu>; 'Susan M. Gapstur' <susan.gapstur@cancer.org>; 'W. Ryan Diver' <ryan.diver@cancer.org>

**Subject:** Examine Strong New Evidence Supporting EPA Transparency Rule

June 4, 2018

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ACS Vice President for Epidemiology

W. Ryan Diver, MSPH <[ryan.diver@cancer.org](mailto:ryan.diver@cancer.org)>

ACS Epidemiology Data Analysis Core Director

Dear EPA Commenters,

I am writing because you made May 31, 2018 verbal public statements to the EPA Science Advisory Board that were critical of the proposed EPA Rule “Strengthening Transparency in Regulatory Science” (<https://yosemite.epa.gov/sab/sabproduct.nsf/MeetingCalBOARD/7D239353BCECF85B852582600058B716?OpenDocument>). Please read my May 30, 2018 written public comments in support of this Rule ([https://yosemite.epa.gov/sab/sabproduct.nsf/D41456F68B9F91658525829D004DBD73/\\$File/88483770.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/D41456F68B9F91658525829D004DBD73/$File/88483770.pdf)). My recent acquisition of and analysis of ACS CPS II data provide strong evidence that data access, transparency, and independent analysis must be essential aspects of EPA regulatory science.

My March 28, 2017 *Dose-Response* article “Fine Particulate Matter and Total Mortality in Cancer Prevention Study Cohort Reanalysis” (<http://journals.sagepub.com/doi/full/10.1177/1559325817693345>) found NO significant relationship between fine particulate matter (PM2.5) and total mortality during 1982-1988 in the ACS CPS II cohort, except for replication of the carefully selected results in the 1995 *AJRCCM* Pope article. Furthermore, none of my analyses or findings have violated the confidentiality of any CPS II subject. My null findings challenge the robustness and integrity of the positive relationship between PM2.5 and total mortality in the 1995 *AJRCCM* Pope article, the 2000 HEI Reanalysis Report, and the 2009 HEI Research Report 140. The 1995 *AJRCCM* Pope article, an example of ‘pivotal regulatory science,’ played the major role in the establishment of the 1997 EPA PM2.5 NAAQS and my Reanalysis shows that is severely flawed.

Dr. C. Arden Pope III and ACS have criticized my Reanalysis, but they have identified no errors in it. My May 29, 2018 *Dose-Response* “Response to Criticism” (<http://journals.sagepub.com/doi/pdf/10.1177/1559325818769728>) addresses their criticism and provides additional evidence of NO relationship between PM2.5 and total mortality in the CPS II cohort. My repeated requests to Dr. Pope and ACS (Dr. Susan M. Gapstur and Mr. W. Ryan Diver) for a full assessment of my findings and for collaboration have been rejected. Thus, I suggest that you ask them to confirm or refute my findings. My Reanalysis and Response, as they stand, indicate a clear need to reassess the EPA PM2.5 NAAQS. In any case, I have demonstrated the importance to EPA regulatory science of access to underlying data.

Please contact me if you would like to discuss my Reanalysis and/or the EPA Transparency Rule.

Thank you very much for your consideration.

Sincerely yours,

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“He was also an author of the most recent World Health Organization (WHO) Global Burden of Disease (GBD) report, published in the Lancet in 2012, which provided global estimates of the life years lost due to outdoor fine particulate matter air pollution (PM2.5), which were based in large measure on Dr. Thurston’s ACS cohort studies of PM2.5 air pollution and mortality . . .”

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<https://www.pulmonaryfellowship.hms.harvard.edu/mary-b-rice-md-mph/>

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