

Date: 07:04 AM 8/25/2008
To: "Thomas Smith" <tsmith@hohp.harvard.edu>
From: "James E. Enstrom" <jenstrom@ucla.edu>
Subject: Petition Challenging CARB Diesel TAC Declaration

August 25, 2008

Thomas Smith, Ph.D.
Department of Environmental Health
Harvard School of Public Health
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Dear Dr. Smith:

I am writing because your epidemiologic research was prominently used in the Scientific Review Panel (SRP) deliberations that lead to the 1998 declaration by the California Air Resources Board (CARB) that diesel particulate matter is a toxic air contaminant (TAC). This TAC declaration has subsequently led to the May 22, 2008 CARB estimate that diesel particulate matter is responsible for 3,900 premature deaths in California annually. However, there is extensive evidence, not used by CARB, indicating that fine particulate matter does not currently cause premature deaths in California. This evidence is described in my attached July 11, 2008 comments regarding the May 22, 2009 CARB Draft Staff Report **Methodology for Estimating Premature Deaths Associated with Long-term Exposures to Fine Airborne Particulate Matter in California**. Because of this new evidence and other related reasons, a group of California professors, including myself, has petitioned CARB to reassess its 1998 TAC declaration regarding diesel particulate matter, as described in the attached June 17, 2008 letter.

Because of the reservations you expressed in your March 11, 1998 SRP comments, some of which are shown below, would you be willing to submit to CARB and me your latest occupational epidemiologic evidence relevant to the 1998 TAC declaration regarding diesel particulate matter? Particularly helpful would be California-specific evidence on mortality rates among railroad workers and truck drivers exposed to diesel exhaust and/or detailed evidence on the dose-response relationship between diesel exhaust exposure and lung cancer.

Thank you very much for your consideration regarding this important issue.

Best regards,

Jim
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<http://www.arb.ca.gov/srp/mt031198.pdf>

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18 DR. FUCALORO: WE HAVE A KIND OF, IT SEEMS TO ME,
19 AN INTERESTING SITUATION HERE WHERE WE'RE GETTING SOME OF
20 THE ADVISE FROM THE PEOPLE HERE, INCLUDING DR. MACK AND
21 DR. ALLAN SMITH ABOUT -- WARNING NOT TO PLACE OVERRELIANCE
22 ON DOSE-RESPONSE CURVES, AND YET WE HAVE SOME PEOPLE HERE
23 WHO ARE WORKING VERY HARD TO GET DOSE-RESPONSE CURVES.

24 I WOULD LIKE TO -- I WOULD LIKE TO ASK
25 DR. TOM SMITH, WHAT DOES HE THINK OF THE ADVICE THAT WE
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01 SHOULDN'T OVERLY RELY UPON A DOSE-RESPONSE CURVES IN ORDER
02 TO MAKE THE DECISION WE NEED TO MAKE SOON?

03 DR. TOM SMITH: WELL, THAT'S -- I THINK, IN FACT,
04 THAT CUTS TO THE CENTER OF THE ISSUE. MY PERSONAL VIEW IS
05 THAT -- THAT THE DATA, AS SUMMARIZED BY ALLAN, WERE -- ARE
06 RATHER CONVINCING.

07 AND I THINK THAT THE QUESTION, DOES EXPOSURE
08 TO DIESEL EXHAUST IN A VARIETY OF CONTEXTS APPEAR TO
09 ELEVATE RISK OF LUNG CANCER? I THINK WE CAN ANSWER FAIRLY
10 COMFORTABLY, YES.

11 BUT THE NEXT QUESTION, ALL RIGHT, GIVEN A YES
12 TO THAT, HOW MUCH EXPOSURE CAUSES HOW MUCH RISK? I DON'T
13 THINK WE HAVE THE DATA TO ANSWER THAT QUESTION, AND THE
14 REASON WE DON'T HAVE THAT DATA IS BECAUSE WE'VE BEEN
15 TRYING TO ANSWER THE FIRST QUESTION.

16 AS A SCIENTIST WHOSE GOAL IN LIFE, IF YOU
17 WANT, IS TO DEFINE DOSE-RESPONSE RELATIONSHIPS USING
18 EPIDEMIOLOGIC TYPES OF DATA, THIS STUDY REPRESENTS THE
19 BEST WE COULD DO IN 1980. WE COULD DO MUCH, MUCH BETTER
20 NOW. AND KATHIE POINT OUT A LOT OF THE REASONS AND SO
21 FORTH, SO THAT I'M AFRAID THE BEST YOU CAN HOPE TO DO AT
22 THIS POINT IS DEFINE THAT THERE'S SOME VERY WIDE RANGE
23 THAT THE EXPOSURES MAY HAVE BEEN IN.

24 AND GIVEN THAT, IT'S UP TO THE POLICY SIDE OF
25 THE HOUSE, IF YOU WANT, TO DECIDE IF THAT'S SUFFICIENT TO
0154

01 MOVE AHEAD. AND I'M NOT A POLICY PERSON, SO I CAN'T
02 ANSWER THAT QUESTION. IN FACT, I SUSPECT YOU GUYS ARE
03 MUCH BETTER -- POSITION FOR THAT THAN ME.

Attachments:

C:\AirPollution\CARB Enstrom Comments Re PM2.5 Mortality Report 071108.pdf;
C:\AirPollution\Petition Challenging CARB Diesel TAC Declaration 061708.pdf;