

Politicized EPA Promotes Anti-American Pseudoscience

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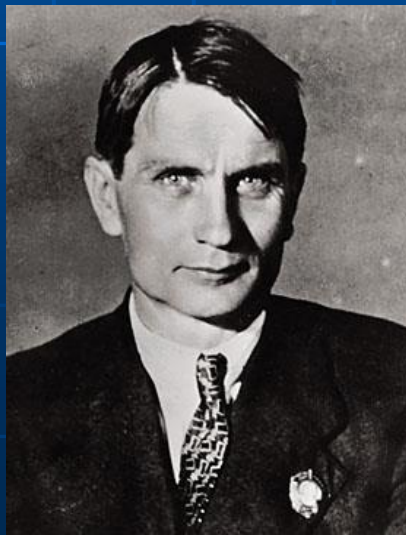
August 16, 2022

Trofim Denisovich Lysenko (1898-1976)

Agronomist destroyed agriculture in the Soviet Union and caused starvation by promoting false plant genetics and suppressing honest scientists with help from Joseph Stalin.

Current US Lysenkoism involves promoting the Green New Deal by misusing science and the scientific method and by suppressing honest science and honest scientists.

Died on November 20, 1976 in the Soviet Union
Resurrected on January 20, 2021 in the USA



Example of EPA Pseudoscience: Fine Particulate Matter (PM_{2.5}) *Causes* Premature Deaths

US EPA established the 1997 Annual National Ambient Air Quality Standard (NAAQS) for PM_{2.5} as 15 µg/m³, lowered to 12 µg/m³ in 2012, based largely on 1995 ACS “secret science” epidemiology claim that PM_{2.5} *causes* premature deaths in 1982 CPS II cohort.

The PM_{2.5} NAAQS and PM_{2.5} Death Claims have been used to justify many EPA regulations that have multi-billion dollar economic impacts in US: State Implementation Plans, Air Quality Management Plans, Clean Power Plan, MATS Rule, CARB Truck and Bus Regulation, CARB Advanced Clean Car Regulations, etc

Reasons for NO PM_{2.5} Premature Deaths

(<http://www.scientificintegrityinstitute.org/PMPanel121021.pdf>)

1) No Etiologic Mechanism:

No experimental proof that 1-5 grams of PM_{2.5} causes death

2) Weak Epidemiologic Risk:

Tiny positive relative risks do not prove that PM_{2.5} causes death

3) Ecological Fallacy:

PM_{2.5} monitors are inaccurate and exaggerate human exposure

4) Uncontrolled Confounding Variables:

Co-pollutants, temperature, others weaken any effect of PM_{2.5}

4) Enstrom Reanalysis Reveals Irreproducibility:

ACS CPS II PM_{2.5}-Deaths invalidated upon reanalysis of data

5) Totality of US Cohort Studies Shows NO Relationship:

Objective meta-analysis of US cohorts shows NO PM_{2.5}-Deaths

December 4, 2020 Decision of EPA by Andrew Wheeler

Federal Register / Vol. 85, No. 244 / Friday, December 18, 2020 / Rules and Regulations

(<https://www.govinfo.gov/content/pkg/FR-2020-12-18/pdf/2020-27125.pdf>)

ENVIRONMENTAL PROTECTION AGENCY 40 CFR Part 50 [EPA–HQ–OAR–2015–0072; FRL–10018–11– OAR] RIN 2060–AS50 Review of the National Ambient Air Quality Standards for Particulate Matter AGENCY: Environmental Protection Agency (EPA). ACTION: Final action.

SUMMARY: Based on the Environmental Protection Agency’s (EPA’s) review of the air quality criteria and the national ambient air quality standards (NAAQS) for particulate matter (PM), the Administrator has reached final decisions on the primary and secondary PM NAAQS. With regard to the primary standards meant to protect against fine particle exposures (i.e., annual and 24- hour PM_{2.5} standards), the primary standard meant to protect against coarse particle exposures (i.e., 24-hour PM₁₀ standard), and the secondary PM_{2.5} and PM₁₀ standards, the EPA is retaining the current standards, without revision. DATES: This final action is effective December 18, 2020.

[Retain Existing Annual PM_{2.5} NAAQS of 12 µg/m³]

January 20, 2021 Presidential Order Protecting Public Health

<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-public-health-and-environment-and-restoring-science-to-tackle-climate-crisis/>

Section 1. Policy. Our Nation has an abiding commitment to empower our workers and communities; promote and protect our public health and the environment; and conserve our national treasures and monuments, places that secure our national memory. Where the Federal Government has failed to meet that commitment in the past, it must advance environmental justice. In carrying out this charge, the Federal Government must be guided by the best science and be protected by processes that ensure the integrity of Federal decision-making. . . .

To that end, this order directs all executive departments and agencies (agencies) to immediately review and, as appropriate and consistent with applicable law, take action to address the promulgation of Federal regulations and other actions during the last 4 years that conflict with these important national objectives, and to immediately commence work to confront the climate crisis.

June 10, 2021 EPA News Release: EPA to Reexamine Health Standards for Harmful Soot that Previous Administration Left Unchanged

(<https://www.epa.gov/newsreleases/epa-reexamine-health-standards-harmful-soot-previous-administration-left-unchanged>)

“The strong body of scientific evidence shows that long- and short-term exposures to fine particles (PM_{2.5}) can harm people’s health, leading to heart attacks, asthma attacks, and premature death.”

“EPA will move expeditiously to reconsider the decision to retain the particulate matter NAAQS, in a manner that adheres to rigorous standards of scientific integrity and provides ample opportunities for public input and engagement.”

2021 EPA CASAC Members—Sued in Young-Cox v. EPA

Elizabeth A Sheppard U Washington WA IPMRP, HEI, Fann, Peel,
Schwartz sheppard@uw.edu

Michelle L Bell Yale U CT HEI Health Review Comm Dominici, Schwartz
michelle.bell@yale.edu

James W Boylan Georgia Natural Resources GA 2000 CASAC Member

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judy.chow@dri.edu

Mark W Frampton U Rochester NY 2020 CASAC Member
mark_frampton@urmc.rochester.edu

Christina H Fuller Formerly Georgia State U GA
green.revolution@gmail.com

Alexandra G Ponette-Gonzalez U North Texas TX
alexandra.ponette@unt.edu

Key Activist 2021 EPA CASAC PM Panel Members

John R Balmes, MD UCSF & UCB CA **CARB Life Member since 2007**,
Independent Particulate Matter Review Panel (IPMRP)
November 16, 2009 37-page Letter re CARB Fraud by CARB Member John
Telles, MD, involving Balmes
(<http://www.scientificintegrityinstitute.org/Telles111609.pdf>)
john.balmes@ucsf.edu

Michael T Kleinman, PhD UC Irvine CA **CARB SRP Life Member since 2010**,
Independent Particulate Matter Review Panel (IPMRP)
CARB SRP Conflicts of Interest and Misrepresentations by Kleinman
(<http://www.scientificintegrityinstitute.org/UCASSRP083115.pdf>)
mtkleinm@uci.edu

Jennifer L Peel, PhD Colorado State U CO HEI Review Comm Sheppard
Enstrom Request to CSU RIO to Talk with Peel About PM2.5 Epidemiology
(<http://www.scientificintegrityinstitute.org/CSURIOPeel031122.pdf>)
jennifer.peel@colostate.edu

September 15, 2021 Enstrom Comment to NASEM DELS-BEST NAAQS Committee “Assessing Causality from a Multidisciplinary Evidence Base for National Ambient Air Quality Standards”
(<http://www.scientificintegrityinstitute.org/NASEMDominici091521.pdf>)
Clifford S. Duke, PhD cduke@nas.edu & Samm Magsino smagsino@nas.edu

Case for Removing Harvard TH Chan School of Public Health Professor of Biostatistics Francesca Dominici from NASEM NAAQS Committee

Dominici should be removed from this NASEM Committee for the five reasons presented below. These reasons provide strong evidence that she cannot honestly and objectively contribute to the Committee goal to “consider frameworks to assess causality of health and welfare effects of air pollutants in EPA’s Integrated Science Assessments (ISAs) conducted as part of EPA reviews of National Ambient Air Quality Standards (NAAQS).”

1. Dominici has been using detailed US Medicare records since 2006 to conduct ecological epidemiology research and to publish etiologically flawed links between air pollution and various health conditions. . . .

October 21, 2021 Young & Cox v EPA Lawsuit by Jones Day Against Biased CASAC & SAB Scientists Appointed in 2021 (Case 1:21-cv-02623-TJK)

(<https://junkscience.com/2021/10/preliminary-injunction-sought-in-young-v-epa/>)

(<https://junkscience.com/2021/10/former-casac-chair-added-as-plaintiff-in-young-v-epa/>)

(https://www.theepochtimes.com/biden-epas-purge-of-industry-representatives-violated-federal-law-lawsuit_4038826.html)

In an unprecedented move, EPA purged all industry representatives from two important advisory committees [CASAC and SAB] and proceeded to stack those committees with academics who are financially beholden to EPA for multi-million dollar research grants.

These newly constituted, industry-free advisory committees are neither fairly balanced nor protected from inappropriate influence in violation of the Federal Advisory Committee Act (“FACA”).

United States District Judge Timothy J. Kelly Denied a Preliminary Injunction on February 16, 2022, but has not ruled on the lawsuit itself.

November 17, 2021 Public Comment to EPA CASAC PM
Panel by EPA SAB and NASEM NAAQS Member
Richard L. Smith, PhD, U North Carolina Statistics Professor

Dependence of short-term mortality on fine particulate matter in
the population of elderly Medicare beneficiaries. Unpublished UNC
Preprint (<http://scientificintegrityinstitute.org/PMPanelRLS111721.pdf>)

I believe this study was deficient: Di, Dai, Wang, Zanobetti, Choirat,
Schwartz, Dominici. Association of short-term exposure to air pollution with
mortality in older [Medicare] adults. JAMA 318:2446, 2017.

Results can sometimes be highly sensitive to seemingly minor changes in
the statistical methodology.

There has been no progress towards insuring greater reproducibility
(or replicability) in EPA studies.

CASAC should include “replicability” as an explicit criterion for weighting air
pollution studies.

December 10, 2021 Enstrom Comment to EPA CASAC PM Panel on 2021 PM ISA and 2021 PM PA relevant to November 17, 2021 Public Comment – 36 pages of detailed criticism back to 1994 was totally ignored EPA CASAC PM Panel

(<http://www.scientificintegrityinstitute.org/PMPanel121021.pdf>)

(https://www.youtube.com/watch?v=P6OhZaaexv8&ab_channel=SamuelDelk)

The June 13, 1996 CASAC Chair George T. Wolff, MD letter to EPA illustrates the weaknesses of the evidence regarding the establishment of the 1997 PM_{2.5} NAAQS. Of the eight PM experts in the three most relevant disciplines (epidemiology, toxicology, and statistics), four (Drs. Larntz, Mauderly, Sly, and Stolwijk) recommended an annual PM_{2.5} standard that varied from 15 to 30 $\mu\text{g}/\text{m}^3$ and averaged 23.1 $\mu\text{g}/\text{m}^3$, and four (Drs. McClellan, Menzel, Samet, and Speizer) recommended NO annual PM_{2.5} standard. The annual 1997 PM_{2.5} standard as set at 15 $\mu\text{g}/\text{m}^3$, the low end of all these recommendations. A key quote from the letter states the uncertainties that still exist “The diversity of opinion also reflects the many unanswered questions and uncertainties associated with establishing causality of the association between PM_{2.5} and mortality. . . .”

January 4, 2022 Enstrom Email to Harvard Chan SPH
Biostatistics Chair Quackenbush with Scientific
Misconduct Complaint Against Harvard Chan SPH
Biostatistics Professor Francesca Dominici, PhD (Italy)
(<http://scientificintegrityinstitute.org/JEEDominici010422.pdf>)

My complaint consists of the following nine points that challenge the scientific validity of her EPA-funded claims that inhaling about 100 μg of fine particulate matter (PM_{2.5}) per day **causes** premature deaths without any proven **causal** mechanism.

Time is of the essence regarding my complaint because the EPA CASAC and its PM Panel are now preparing to formally recommend tightening the PM_{2.5} NAAQS and the NASEM NAAQS Committee is preparing (via secret meetings) a report on **causality** that is highly relevant to the PM_{2.5} NAAQS.

Nine Aspects of the Unanswered January 4, 2022 Enstrom
Scientific Misconduct Complaint Against Harvard Chan SPH
Biostatistics Professor & NASEM NAASQ Francesca Dominici
(<http://scientificintegrityinstitute.org/JEEDominici010422.pdf>)

1. Deliberate falsification re research showing NO PM2.5 deaths
2. Opposition to Transparency & Reproducibility in EPA Research
3. Ignores All Challenges to Validity of PM2.5 NAAQS
4. Smith 2021 reanalysis of Di 2017: NO PM2.5 deaths $<12 \mu\text{g}/\text{m}^3$
5. Service on NASEM NAAQS Committee violates Its COI Policy
6. Existing Low US PM2.5 Levels Invalidate tightening PM2.5 NAAQS
7. Misuse of Medicare records for unjustified **causal** conclusions
8. No Informed Consent for Use of 69 Million Medicare Records
9. 30+ Chinese co-authors are concern for Medicare confidentiality

February 25, 2022 Enstrom Public Comment to EPA CASAC PM Panel

(<http://www.scientificintegrityinstitute.org/PMPanel022522.pdf>)

(<https://www.youtube.com/watch?v=ZkMsBXwyenw>)

(https://casac.epa.gov/ords/sab/f?p=113:19:22380851460992:::RP,19:P19_ID:966)

The recommendations of the PM Panel and EPA staff to tighten the PM_{2.5} NAAQS are based on a deliberately falsified research record regarding PM_{2.5}-related deaths. Falsification is serious scientific misconduct as defined in the January 11, 2022 White House OSTP Scientific Integrity Task Force Report.

There is NO scientific or public health justification for tightening the PM_{2.5} NAAQS because there is no etiologic mechanism by which inhaling about 100 µg of PM_{2.5} per day can cause death and the US already has a very low average PM_{2.5} level of 7 µg/m³ whereas our competitor China has a very high level of 48 µg/m³. Indeed, there are adverse public health, welfare, social, economic, and energy effects associated with tightening the PM_{2.5} NAAQS.

March 18, 2022 132-page EPA-CASAC-22-002 Letter to EPA Administrator Michael S. Regan by CASAC Chair Elizabeth A. Sheppard, PhD. This EPA CASAC Letter DID NOT Address Any Oral or Written Public Comment Submitted to CASAC in 2021 or 2022

Subject: CASAC Review of the EPA's *Policy Assessment for the Reconsideration of the National Ambient Air Quality Standards for Particulate Matter (External Review Draft – October 2021)*

“Regarding the level of the annual PM_{2.5} standard, the majority of CASAC members find that an annual average in the range of 8-10 µg/m³ would be appropriate. . . .

A minority of CASAC members find that a range of 10-11 µg/m³ for the annual PM_{2.5} standard would be appropriate.”

(https://casac.epa.gov/ords/sab/f?p=113:18:3369212450696:::RP,18:P18_ID:2607)

April 18, 2022 *Science* Editor-in-Chief Holden Thorp rejects Enstrom's Request to Publish Something in *Science* on Transparency re PM_{2.5} Causing Death (<http://www.scientificintegrityinstitute.org/ThorpJEE041822.pdf>)

April 1 Enstrom: Thank you very much for speaking with me today about the EPA Transparency Rule. Please examine the following two links. . . . Please let me know how you decide to proceed on this matter, particularly whether you will consider a Policy Forum, Letter, or eLetter from me on this subject.

April 18 Thorp: I have reviewed all of the files and discussed with the editors. We have decided not to do anything further on this. I know that is not the answer you hoped for, but at least you got a response. I realize you may state publicly that we did not engage.

June 20, 2022 Enstrom Email to Kiros T. Berhane, PhD (Ethiopia) Columbia Biostatistics Chair & Former USC Preventive Medicine Professor ktb2132@cumc.columbia.edu did not address my concerns, such as, those below (http://scientificintegrityinstitute.org/JEE_Berhane062022.pdf):

... there are severe flaws in “the body of evidence” and the National Ambient Air Quality Standards (NAAQS) in the US are not based on an objective assessment of all the relevant epidemiological, toxicological, and experimental evidence. In other words, honest science has nothing to do with the current NAAQS, as documented in the nine items below.

Item 7: February 22, 2019 Enstrom Complaint to USC Vice President of Research re USC Preventive Medicine Research Misconduct Involving Air Pollution: <http://scientificintegrityinstitute.org/USCVPRes022219.pdf>

June 26, 2022 HEI Berhane Webinar ‘**Setting Ambient Air Quality Standards - What's Science Got To Do With It?**

(<https://www.youtube.com/watch?v=XAcrlTxeiXA>), within the June 26-28, 2022 **Health Effects Institute Annual Conference** (<https://www.healtheffects.org/annual-conference>)

June 30, 2022 Enstrom Email to Richard A. Meserve, PhD, JD, Chair, Health Effects Institute Board of Directors with Evidence of HEI Misconduct rmeserve@carnegiescience.edu & rmeserve@cov.com (<http://scientificintegrityinstitute.org/JEEMeserve072222.pdf>)

June 30, 2022 Enstrom: I have extensive evidence dating back to 2002 of scientific misconduct in HEI-sponsored air pollution health effects research. Thus, I request that you initiate an independent investigation of evidence of scientific misconduct by HEI. . . .

July 5, 2022 Meserve: Both I and the HEI take issues of scientific misconduct very seriously. But in my view there is no reason to open up an old dispute yet again.

July 6, 2022 Enstrom: you could organize a Zoom Session to debate the scientific validity of the EPA PM2.5 NAAQS, particularly the claim that PM2.5 *causes* premature deaths.

July 18, 2022 Meserve: I don't agree that there would be much value in arranging a debate on whether particulates cause premature death. There is a current NASEM committee that is exploring exactly that issue. . . .

Stop EPA from Tightening PM_{2.5} NAAQS

Recommendations:

Submit Public Comment to August 29 EPA CASAC Ozone Panel Zoom:

Example is June 8, 2022 Enstrom Public Comment

(<http://www.scientificintegrityinstitute.org/ozonepanel060822.pdf>)

Email EPA CASAC Members (Slide 8) & PM Panel Members (Slide 9)

Email NASEM NAAQS Officials Clifford Duke-Samm Magsino (Slide 10)

Email HEI Board of Directors Chair Richard Meserve (Slide 20)

Support Efforts of Heritage PM_{2.5} Working Group, CO₂ Coalition,

Cooler Heads Coalition, and Heartland Institute (Google Them)

Force EPA to Follow June 30, 2022 SCOTUS Decision on WV v. EPA

Oppose Reinstatement by EPA of the Clean Air Act California Waiver