

August 29, 2022

US EPA CASAC Ozone Review Panel Regarding Ozone NAAQS Reconsideration
https://casac.epa.gov/ords/sab/f?p=113:19:17031850757072:::RP,19:P19_ID:976
<https://youtu.be/UkmVujyGsq0> (minutes 18-24)
<http://scientificintegrityinstitute.org/OzonePanel082922.pdf>

Dr. James Enstrom's Verbal Comment to EPA CASAC Ozone Review Panel

I am Dr. James Enstrom. I have had a long career as an epidemiologist at UCLA and I have made significant contributions to air pollution epidemiology, particularly regarding the importance of transparency and reproducibility. I have made oral public comments to CASAC on November 17, 2021 (<http://scientificintegrityinstitute.org/PMpanel121021.pdf>), February 25, 2022 (<http://scientificintegrityinstitute.org/PMpanel022522.pdf>), and June 8, 2022 (<http://scientificintegrityinstitute.org/Ozonepanel060822.pdf>) and I have submitted detailed written criticism based on these comments. My criticism is highly relevant to the PM2.5 and Ozone NAAQS. Thus far, the criticism by me and numerous other public speakers has been totally ignored by CASAC. This lack of response represents disrespect for objective science by CASAC.

I described this disrespect in my August 16, 2022 DDP talk "Politicized EPA Promotes Anti-American Pseudoscience" (<https://rumble.com/v1gvnuf-politicized-epa-promotes-anti-american-pseudoscience.html>). I pointed out that the January 20, 2021 Presidential Order Protecting Public Health directed immediate review and action to "address the promulgation of Federal regulations and other actions during the last 4 years" (<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/>). This order challenged the validity of all Federal regulations during the Trump Administration and led to the unjustified creation of the current CASAC. This order is a prime example of how regulatory science in America has become highly politicized. An ongoing Federal Lawsuit makes a strong case that the current CASAC is illegally constituted because it violates the Federal Advisory Committee Act requirements of viewpoint diversity and no conflicts of interest (<https://junkscience.com/2021/10/former-casac-chair-added-as-plaintiff-in-young-v-epa/>).

In addition, CASAC refuses to address the evidence that current average levels of human exposure to PM2.5 and ozone in the US are below the levels of known human health effects. In my office in the supposedly polluted city of Los Angeles, my ozone monitor reads about 10 parts per billion (ppb) and my PM2.5 monitor reads about 3 $\mu\text{g}/\text{m}^3$. These levels are far below the current NAAQS (<https://www.epa.gov/criteria-air-pollutants/naqs-table>).

Also, CASAC refuses to acknowledge the extreme publication bias against null air pollution health effects findings that I documented in my earlier comments. The 2021 EPA Policy Assessment for PM2.5 ignored at least 60 authors, including me, who have published null findings or criticized the PM2.5 NAAQS (<http://scientificintegrityinstitute.org/PMpanel121021.pdf>). Similar publication bias exists regarding the Ozone NAAQS, but even with this bias the April 2022 EPA Ozone Policy Assessment Reconsideration recommended leaving the Ozone NAAQS unchanged ([draft 2022 policy assessment](#)).

Also, CASAC refuses to support the fundamental principle of the scientific method that air pollution health effects must be based on findings that are transparent and reproducible. My 2017 and 2018 reanalysis of the ACS CPS II cohort found serious flaws in the seminal Pope 1995 article and the 2000 HEI Reanalysis and demonstrated the importance of access to underlying data (<http://scientificintegrityinstitute.org/DRPM25JEEPope052918.pdf>). However, on April 18 *Science* Editor-in-Chief Holden Thorp reinforced his strong bias against EPA transparency by personally writing to me that he will not publish any article, letter, or electronic letter that I submit to *Science* that supports “Strengthening Transparency in Regulatory Science” (<http://scientificintegrityinstitute.org/ThorpJEE041822.pdf>).

As my final evidence of anti-science bias, CASAC Member Christina Fuller gave a misleading presentation in the June 26 HEI Webinar “Setting Ambient Air Quality Standards—What’s Science Got to Do With It?” (<https://www.youtube.com/watch?v=XAcrlTxeiXA>). Furthermore, she has not addressed my June 30 evidence that science has nothing to do with the current NAAQS (<http://scientificintegrityinstitute.org/JEEFuller081822.pdf>). Even worse, the HEI Board of Directors Chair Richard Meserve rejected my June 30 request to initiate an independent investigation of misconduct by HEI and my July 6 request to arrange a debate on whether particulates cause premature death (<http://scientificintegrityinstitute.org/JEEMeserve072222.pdf>). These developments challenge the scientific integrity of HEI.

In conclusion, CASAC must address the extensive evidence that Americans are not being harmed by their current personal exposure to PM2.5 and ozone, but are being harmed by the regulations that are due to scientifically flawed PM2.5 and ozone NAAQS. However, regardless of what CASAC does, this evidence is being presented to the American people.

Thank you very much.

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