

February 25, 2022

US EPA CASAC PM Panel Webcast re PM2.5 NAAQS based on 2021 PM ISA Supp & PM PA

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

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

Dr. James Enstrom's Verbal Comment to EPA CASAC PM Panel re PM2.5 NAAQS

I have 50 years of experience in conducting epidemiologic cohort studies and I have published important peer-reviewed PM2.5 death findings based on ACS CPS I and CPS II cohort data. The February 4 PM Panel letters do not address the detailed public criticism of the 2021 PM ISA Supplement and PM PA. The EPA staff has made NO changes in these documents in response to this criticism. In particular, they ignored Richard Smith's evidence of NO PM2.5 deaths below 12 $\mu\text{g}/\text{m}^3$ and my 36 pages of evidence that PM2.5 DOES NOT *cause* premature deaths in the US (<http://scientificintegrityinstitute.org/pmpanel121021.pdf>).

The recommendations of the PM Panel and EPA staff to tighten the PM2.5 NAAQS are based on a deliberately falsified research record regarding PM2.5-related deaths. Falsification is serious scientific misconduct as defined in the January 11 White House OSTP Scientific Integrity Task Force Report. Thus, I request that Jennifer Peel, with a PhD in Epidemiology, confirm that the PM PA is "a robust and comprehensive evaluation of the epidemiologic literature" and that public comments like mine do not alter her evaluation.

There is NO scientific or public health justification for tightening the PM2.5 NAAQS because there is no etiologic mechanism by which inhaling about 100 μg of PM2.5 per day can cause death and the US already has a very low average PM2.5 level of 7 $\mu\text{g}/\text{m}^3$ whereas our competitor China has a very high level of 48 $\mu\text{g}/\text{m}^3$. Indeed, there are adverse public health, welfare, social, economic, and energy effects associated with tightening the PM2.5 NAAQS. This tightening will hurt America at a time when it is facing military and economic dangers from Russia and China, as well as rapidly increasing energy costs. Finally, I strongly support the ongoing Young and Cox v. EPA lawsuit because the Biden CASAC and its PM Panel are illegally constituted and in gross violation of the Federal Advisory Committee Act. The current misguided effort to tighten the PM2.5 NAAQS must be stopped.

Thank you.

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