

COARSE PARTICULATE COALITION

NATIONAL MINING ASSOCIATION • NATIONAL STONE SAND & GRAVEL ASSOCIATION • INDUSTRIAL MINERALS
ASSOCIATION-NORTH AMERICA • AMERICAN FOREST & PAPER ASSOCIATION • PORTLAND CEMENT
ASSOCIATION • NATIONAL COTTON COUNCIL

1666 K STREET, NW
SUITE 500
WASHINGTON, DC 20006-2803
(202) 887-1400

August 31, 2005

VIA ELECTRONIC MAIL

Dr. Rogene Henderson
Chair
Clean Air Scientific Advisory Committee
Scientist Emeritus
Lovelace Respiratory Research Institute
2425 Ridgecrest Drive SE
Albuquerque, NM 87108

Re: **CASAC Coarse PM Recommendations**

Dear Dr. Henderson:

As the Clean Air Scientific Advisory Committee (CASAC) prepares to issue its final recommendations on the coarse particulate matter (PM) portions of the final PM Staff Paper (SP), the Coalition would emphasize the following issues for the Committee's consideration.

A recurring theme in the Committee's deliberations and prior advice to EPA staff has been the need to continue coarse PM monitoring for public health research purposes. As noted in the Coalition's letter of August 5, EPA has authority to continue such monitoring in the absence of an ambient air quality standard. EPA's current regulations for ambient air quality surveillance provide:

Monitoring Other Pollutants

The Administrator may promulgate criteria similar to that referenced in subpart B of this part for monitoring a pollutant for which a National Ambient Air Quality Standard does not exist. Such an action would be taken whenever the Administrator determines that a nationwide monitoring program is necessary to monitor such a pollutant (40 CFR § 58.61).¹

¹ The referenced subpart B specifies the federal requirements for quality assurance, monitoring methods, siting, operating schedules and special purpose monitors (see 40 CFR Part 58, subpart B).

Accordingly, it is clear that EPA has the requisite authority to establish the coarse PM monitoring network that the Committee desires without adopting a coarse PM standard.

Apart from the monitoring issue, the Coalition would reiterate two points discussed our letter of August 5 and prior correspondence: (1) even a standard at the high end of the range recommended in the SP would be nearly twice as stringent as the current PM₁₀ standards at facilities where emissions are dominated by coarse PM; and (2) the CD, the SP and the Committee's prior reports uniformly support a conclusion that current population exposures to coarse PM emissions from mining, agricultural and similar sources are not likely to be harmful.

As discussed in our prior correspondence and statements to the Committee, we believe it is clear that the available evidence is not sufficient to support a coarse PM standard at this time. Several members of the Committee have stated this view as well. In the course of the Committee's deliberations, both the Committee as a whole and many of the individual members repeatedly have highlighted the weakness of the current health evidence for coarse PM and the need for further research. Earlier this year, the Committee considered a draft recommendation to postpone adoption of a coarse PM standard until the necessary additional research has been performed. The Committee rejected that approach pending completion of the final SP. However, it remains a viable option for the Committee's final recommendation, especially as it is clear that EPA has the authority to establish a coarse PM monitoring network without adopting a standard.

We urge the Committee to take this opportunity to obtain the necessary data *before* EPA proceeds with a standard that would produce severe and unnecessary impacts on our facilities. We ask the Committee to recommend that EPA should use its monitoring authority to establish a coarse PM monitoring network for purposes of public health research, but should not adopt a coarse PM standard at this time. If the Committee recommends adoption of a coarse PM standard, it should exclude emissions from mining, agricultural and similar sources that are not harmful but would be subject to extremely stringent regulation under the concentration range that the SP recommends.

Sincerely,

Kurt E. Blase

Counsel to the Coarse Particulate Coalition