

Health Impacts Analysis:
Estimating Mortality Associated with PM_{2.5} Exposure

PUBLIC WORKSHOP

**August 21, 2006
10:00 to 12:00 PST**

SUMMARY OF PUBLIC COMMENTS

Oral comments are summarized chronologically.

- The focus is too narrow.
- The proposed approach ignores contrary evidence.
- The current epidemiologic models do not account for residual confounding, making them hard to rely on.
- EPA expert elicitation is biased and not representative of the field; the scientists critical of the studies and methods used are not included.
- The summary of public comments should be made available.
- Will EPA pool results from 12 distributions? Lisa Conner responded that EPA will not pool at this time.
- The charge of ARB's peer review needs to be made available.
- The speaker asked about EPA's peer review: how are the reviewers selected? What is the second phase of the review? Lisa Conner responded that next year, EPA may go through the Science Advisory Board or another avenue.
- Will EPA upload the Briefing Book? Lisa Conner responded that the book will be uploaded by end of this week.
- What is the role of health impacts analysis on setting an ambient air quality standard? Richard Bode responded that it's not the basis for setting the standard; rather, it illustrates that meaning and impact of attaining the standard. The assessments are used in regulations designed to control pollutants such as diesel PM.
- Does composition of PM influence toxicity? For example, are nitrates as toxic as directly emitted diesel PM?
- Can impacts based on regional models be calculated for toxic hot spots?
- Can (or should) a regional assessment of PM impacts be divided into separate sources such as locomotives, ships, or another industry?
- Has EPA elicited experts for PM relationships at various levels of PM? Lisa Conner answered that some experts broke out the distribution into segments of PM.
- In general, presenting health benefits in relation to actuarial risk figures (like auto accidents) is misleading.

- Uncertainty range does not fully address sources of uncertainty. Listing of uncertainties unaccounted for in the estimates should be made more prominent.
- Stating that ARB's estimates may be "underestimates" due to unquantified health impacts may be misleading, as there may be factors that would imply the estimates to be overestimates.
- Will the value of a statistical life be updated? Hien Tran answered that such updating is not within the scope of this project.
- Support comments made by previous speakers
- In future reports, the role of a health impacts analysis in revising the health-based air quality standards needs to be clear. ARB needs to be more specific on what types of studies are considered in setting a standard and in estimating health impacts.