# TCEQ LogoNational Comments

# Executive Review Summary

**TCEQ Proposed Comments On:**

the Environmental Protection Agency (EPA) Draft Integrated Science Assessment for Particulate Matter; published in the October 23, 2018 Federal Register (83 *FR* 53471).

**Overview of Proposal:**

The Integrated Science Assessment (ISA) is the first in a series of technical and policy assessments that provide the basis for the primary particulate matter (PM) National Ambient Air Quality Standard (NAAQS). The EPA last revised the primary PM NAAQS in 2012 based on the available scientific literature supporting that standard. The draft ISA summarizes available scientific evidence and provides causal determinations for various health effects, the incidence of which are later modeled to evaluate the health protectiveness of the existing standard and support either the retention of the existing NAAQS or the setting of a new NAAQS.

**Summary of Comments:**

The TCEQ urges the EPA to use available systematic literature review techniques to make its review and integration process more transparent. The EPA should also more thoroughly evaluate exposure error, measurement error, and uncertainty and the impact they have on effect estimates within individual studies, as well as the EPA’s integrated assessment. The TCEQ disagrees with the EPA that sufficient and consistent scientific evidence is available to support many of its causal determinations in the ISA and suggests that subsequent drafts of the ISA more consistently apply the causal framework in the ISA Preamble. The TCEQ’s comments detail specific concerns regarding exposure, biological plausibility, causality, uncertainty, health effects, and suggested methodological improvements.

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**Deadline**:

December 11, 2018