

November 28, 2016

Dr. Bryan J. Bloomer  
Designated Federal Officer  
Science Advisory Board  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Subject: Invitation for Public Comment on the List of Candidates for the EPA Science Advisory Board Ad Hoc Committee for Review of the *Screening Methodologies to Support Risk and Technology Reviews (RTR): A Case Study Analysis*

Dr. Bloomer:

The Association of Air Pollution Control Agencies (AAPCA)<sup>1</sup> appreciates the opportunity to comment on the list of candidates for U.S. Environmental Protection Agency's (EPA) Science Advisory Board (SAB) Ad Hoc Committee for reviewing the EPA's Office of Air and Radiation's draft report *Screening Methodologies to Support Risk and Technology Reviews (RTR): A Case Study Analysis* ("SAB RTR Methods Review Panel").<sup>2</sup>

In the invitation to comment, EPA notes that "a balanced panel is characterized by inclusion of candidates who possess the necessary domains of knowledge, the relevant scientific perspectives (which, among other factors, can be influenced by work history and affiliation), and the collective breadth of experience to adequately address the general charge." Importantly, the list includes experts from state environmental agencies, giving EPA a key opportunity to select individuals that could provide geographically diverse, on-the-ground perspectives, and years of experience addressing emissions of hazardous air pollutants from stationary sources. In particular, the candidates bring expertise in toxicology, health and exposure risk assessment, and air toxics.

AAPCA strongly recommends that EPA's SAB Staff Office consider these state personnel for the SAB RTR Methods Review Panel because of their demonstrated scientific and technical knowledge, as well as their ability to convey diverse expertise and viewpoints.

As the EPA SAB Staff Office reviews these candidates based on the chosen criteria,<sup>3</sup> the Agency should ensure state, local and tribal participation in order to obtain input from experts that work with and implement federal Clean Air Act regulations. The need for a wider, more diverse range of advisors on EPA panels is well-noted:

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<sup>1</sup> AAPCA is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. Twenty state environmental agencies currently sit on AAPCA's Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of The Council of State Governments. You can find more information about AAPCA at: <http://www.cleanairact.org>.

<sup>2</sup> U.S. EPA Science Advisory Board Staff Office, [Invitation for Public Comment on the List of Candidates for the EPA Science Advisory Board Ad Hoc Committee for Review of the Screening Methodologies to Support Risk and Technology Reviews \(RTR\): A Case Study Analysis](#), November 3, 2016.

<sup>3</sup> 81 FR 52683.

- The Consolidated Appropriations Act of 2016, signed into law on December 17, 2015, was accompanied by a report directing the EPA Administrator to develop a policy statement on science quality and integrity for the Science Advisory Board. The report further directed that “EPA’s policy statement should include goals on increasing membership from States and tribes who are often underrepresented...”<sup>4</sup>
- U.S. EPA’s Peer Review Handbook (Fourth Edition) directs that the Agency “include a broad enough spectrum of other related experts to consider wider dimensions of the issue(s)” and “keep a balance by considering new individuals who bring fresh perspectives to the review of a work product.”<sup>5</sup>
- Of the 48 members currently on EPA’s chartered SAB, only two are from state agencies. Additionally, as noted in a May 2015 letter from the Council of State Governments West, EPA’s SAB Staff Office has failed to select intergovernmental experts for other SAB ad hoc panels.<sup>6</sup>

Considering for this panel the candidates that have state-level experience and perspectives would be a step in the appropriate direction. As all of the candidates for the SAB RTR Methods Review Panel were identified by the SAB Staff Office “based on their relevant expertise and willingness to serve,” selecting panelists that meet fundamental criteria, such as a “diversity of scientific expertise and viewpoints,” becomes more vital to the process of creating a balanced panel to review this important document.

In addition to fulfilling the need for proper balance on the SAB RTR Methods Review Panel, AAPCA encourages EPA to solicit advice from, and select for advisory committees and panels, experts from state, local and tribal environmental agencies. These agencies can provide critical guidance as EPA looks to future regulatory actions.

Thank you for the invitation to provide comments on this highly qualified list of candidates. If you have any questions, please contact [cwoods@csg.org](mailto:cwoods@csg.org) or (859) 244-8040.

Sincerely,

A handwritten signature in black ink that reads "Clinton J. Woods". The signature is written in a cursive, slightly slanted style.

Clinton J. Woods, Executive Director  
AAPCA

<sup>4</sup> [Explanatory Statement Submitted for Consolidated Appropriations Act](#), 2016, pg. H10220, December 17, 2015

<sup>5</sup> U.S. EPA, [Peer Review Handbook](#), 4th Edition, October 2015.

<sup>6</sup> The Council of State Governments West, [Letter to Senators Mike Rounds and Edward Markey](#), May 19, 2015.