



*promoting responsible environmental,
health, and safety decision-making*

May 16, 1997

Dear Colleagues and Friends:

Enclosed is The Annapolis Center's report on issues related to the U. S. Environmental Protection Agency's (EPA) air quality standards governing particulate matter (PM). The Annapolis Center is a national non-profit organization that supports and promotes responsible environmental health and safety decision-making. The Center seeks to improve public debate about the potential risk from hazards and to insure that regulatory responses, if necessary, are appropriate to the risks.

In January of 1997, The Center held a workshop in Annapolis Maryland with the intent of better defining the debate concerning the potential health benefits of revising the U.S. EPA's particulate matter air quality standard. A diverse panel of recognized experts in PM representing the U.S. EPA, academia, and industry research groups was invited to participate.


Those experts who chose to attend the workshop engaged in a facilitated discussion on the quality of the evidence that had been presented at that time on the PM issue. Unfortunately, representatives of the EPA could not attend. The participants were encouraged to discuss candidly their professional opinion on the PM issue. This report is the outcome of that discussion. It is a summary of the issues discussed:

- Why there is concern about PM
- What, exactly, is PM
- The state of epidemiological research and animal studies on the potential health impacts of PM
- Biological mechanisms
- Research needs on PM

The proceedings of this workshop should be used as a tool to assist with responsible decision-making in modifying the PM standards and seeking additional research.

Based on its review of the proceedings, The Center has determined that a full and complete picture regarding the potential health impacts of PM can not be established. **Although the science may legally allow EPA to take action, it is clear that the proposed PM air quality standard is a choice driven by policy, not science.**

*Suite 203, 47 State Circle
Annapolis, MD 21401
(410) 268-3302 Fax (410) 268-4953*

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We believe the EPA Administrator is in a regrettable position. EPA is required by legislation to take action on the issue. A court deadline for regulatory action has been imposed; unfortunately, the necessary research to provide a sound scientific basis for this decision was not adequately funded. A rulemaking that will have a multi-billion dollar impact on the nation's economy is being completed based on minimal research that has become increasingly controversial.

In reaching that conclusion, The Center compared the results of our workshop to the tenets for risk assessment and risk management that were established as the Annapolis Accords (see attachment).¹ That comparison shows that the policy proposed by the EPA Administrator is not adequately substantiated by risk assessment data.

The Annapolis Center encourages you to use these proceedings as a tool for evaluating and discussing the particulate matter debate. We set out on this project to help identify the areas of agreement, disagreement, or uncertainty that require additional study, and the general quality of the evidence presented on the PM issues. We believe that it is the obligation of public policy leaders and decisionmakers to design and implement responsible environmental, health, and safety policies.

If you would like additional copies of these proceedings, they can be obtained for \$4.00 by contacting our office at (410)268-3302.

Sincerely,



Harrison Schmitt, Ph.D.
Chairman, The Annapolis Center

In May, 1994, the *Annapolis Center* developed "The Annapolis Accords for Risk Analysis." The "Annapolis Accords" were the product of a workshop held in Annapolis, Maryland, which was sponsored by the Annapolis Center. The workshop included a broad spectrum of prominent scientists, economists, social scientists and risk managers. The "Accords" are a set of principles for evaluating risk assessment and risk management decisions. They provide a vehicle to promote increased communications about, and understanding of, the quality of the science underlying risk analyses, public perception of risk, and the economics of allocating finite resources to mitigate risks. The "Accords" can help users understand the strengths and weaknesses of past risk analyses, policies and plans, as well as be applied to current and future analyses, polices and plans to improve the quality of efforts to protect public health, safety and environmental quality. Copies of the "Accords" can be obtained by contacting the Annapolis Center at (410) 268- 3302.

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