Twitter Thread by H. Christopher ("Chris") Frey



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1/9. There are many problems with this rule. Pruitt/Wheeler threw out EPA's own established procedures to short-circuit the science review: changes to the review process since 2017 undermined its quality, credibility, and integrity.

> #EPA's status quo rule to leave its current ground-level ozone standard in place cleared #OIRA review yesterday after just two weeks. An agency announcement is coming this afternoon. #AirPollution pic.twitter.com/lIGAQBBgkL
>
> — Sean Reilly (@SeanatGreenwire) December 23, 2020

2/9. Pruitt/Wheeler kicked all 7 members off the Clean Air Scientific Advisory Committee, and replaced them under a policy found to be arbitrary and capricious by the U.S. district court of SDNY. The repopulated CASAC has the appearance of lack of impartiality.

3/9. Wheeler refused to form a CASAC Ozone Review Panel 3 months after EPA issued a call for nominations for such a panel, thereby depriving CASAC of the breadth, depth, and diversity of expertise, experience and perspectives needed for ozone NAAQS Review.

4/9. The Ozone review process was truncated and accelerated, leading to inadequate scientific review, and inappropriate commingling of science and policy reviews. Fewer opportunities for public comment created a less transparent NAAQS scientific review process

5/9. As professional malpractice, the stripped down and reconstituted CASAC offered advice outside of its expertise, particularly with regard to epidemiology (there were zero epidemiologists on CASAC). The CASAC chair imposed a burden of proof contrary to that of the CAA.

6/9. CASAC and Wheeler failed to adequately consider at-risk populations. Expert judgment is needed to advise regarding at-risk populations because direct empirical evidence regarding at-risk populations is lacking. CASAC lacked the basis/credibility for making such judgments.

7/9. One member of CASAC acknowledged that "asthma has important features beyond airflow limitation," yet such features were not adequately accounted for in the Administrator's decision.CASAC failed to advise that levels below the current standard would provide margin of safety.

8/9. In a 2015 Wall Street Journal op ed, Dr. Cox, who chaired CASAC in this review, stated that it is “cynical” to “use” “asthma patients to promote a pro-regulation political agenda.” Why was he chairing the ozone review? This is clear appearance of lack of impartiality.

9/9. EPA engaged in science denial in rigging the scientific review process to assure an answer that would fit a predetermined policy outcome. EPA needs to restore process and procedures to re-establish credibility and to assure that regulations follow the science and the law.