

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 8, 2013

Chairman Lamar Smith
Committee on Science, Space and Technology
2321 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Smith,

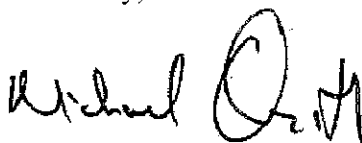
The following statement is based on review of the files your staff submitted to me on August 19th, September 13th and September 30th. The file names are listed in attachment 1.

The subpoena sent by the Committee on Science, Space and Technology to EPA Administrator Gina McCarthy dated August 1, 2011 requested "all analysis and re-analysis of" the Cancer Prevention Study II by the American Cancer Society (ACS) and the Harvard Six Cities (HSC) Studies. The files supplied to date do not fulfill this request. The ACS files do not contain sufficient information on mortality or other variables (age, air conditioning, alcohol use, body mass index, diet, education, employment, income, marital status, race, sex, smoking, and workplace exposure— all included variables in the Pope *et al.* 2002 study as well as the reanalysis by Krewski *et al.* in 2009). The HSC files contain coded data on mortality incidence and air quality, but no information on other variables (age, body mass index, education, race, sex, and smoking — all included variables in the Laden *et al.* 2006 study as well as the reanalysis by Lepeule *et al.* 2012). Furthermore, there is no information regarding the analysis of this data, including critical assumptions or choice of inputs, as would be required for the statistical tests applied (e.g. for Pope *et al.* 2002: Cox proportional hazards modeling with spatial autocorrelation and nonparametric spatial smoothing; for Krewski *et al.* 2009 the Land Use Regression results for industrial, residential, commercial, and agricultural categories are missing; and for Lepeule *et al.* 2012: the "rstrata" variable apparently codes for sex, age, and time period, but the codes are not defined).

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In conclusion, the files provided to date lack critical information, making it impossible to replicate the findings of the ACS or HSC studies.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Honeycutt". The signature is written in a cursive style with a large, prominent initial "M".

Michael Honeycutt, Ph.D.
Director, Toxicology Division
Texas Commission on Environmental Quality

Attachment 1

Files Sent by Committee Staff and Reviewed by TCEQ

Sent August 19, 2013:

Copy of Pope etal 2009 NEJM analytic data and dictionary.xls
EPA Response 8-19-2013.pdf

Sent September 13, 2013:

09-13-2013 EPA Response.pdf
acszipec80.sas7bdat
airp_al.sas7bdat
houseincome.sas7bdat
IPm.dat
ipm_mas.ssd01
Krewski 2009 Data Set Descriptions.doc
lazips270.sas7bdat
ny_krige_lur.xls
o3new.sas7bdat
pm_7200.sas.7bdat
pm25_29.sas7bdat
smsa_gas.ssd01
so2_all.sas7bdat
tsp_8081.ssd01
zip267pm25lur.sas7bdat

Sent September 30, 2013:

Lepeule2012_data_0713 Final.xlsx
Lepeule2012_data_0713_datadictionary final.docx