



California Council for Environmental and Economic Balance

101 Mission Street, Suite 805, San Francisco, California 94105
415-512-7890 phone, 415-512-7897 fax, www.cceeb.org

July 8, 2020

Lori Miyasato, Ph.D.
Panel Liaison
Scientific Review Panel on Toxic Air Contaminants
California Air Resources Board
Submitted Electronically to lori.miyasato@arb.ca.gov

RE: Agenda Item 2: Developing provisional health values to support the AB 2588 Air Toxics "Hot Spots" Program

Dear Dr. Miyasato,

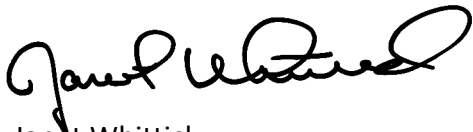
On behalf of the California Council for Environmental and Economic Balance (CCEEB), we submit the following comments for consideration by the Scientific Review Panel (SRP), including the attached May 21 letter previously submitted to Air Resources Board (ARB) staff. In particular, we ask you and the SRP to consider the following questions as part of its deliberations:

- **How should the ARB, SRP, CAPCOA and OEHHA work together to prioritize the list of Appendix A-1 compounds that need health values and cancer potency factors?** Currently, about half (240) of the A-1 listed compounds have health values assigned to them. The proposed amendments would add another 730 or more compounds to the list awaiting review. CCEEB believes the backlog should be prioritized based on which compounds are thought to be the most pervasive and problematic in terms of toxic risks, and that the SRP can provide important guidance on how to approach this work.
- **How should OEHHA determine when interim default health values are appropriate to use?** We assume that interim health values for the 730 proposed new compounds will be conservative and vary widely in terms of expected accuracy. We ask the SRP to provide guidance on and transparency to when and how default health values and cancer potencies are applied, and when defaults should be avoided due to data limitations and uncertainty that can only be addressed through a full OEHHA and SRP review.

- **What are airborne risks from PFAS substances when inhaled, and how can ATHS reported data best be used to improve understanding of toxicity across the different exposure pathways?** CCEEB seeks to better understand how functional groups of perfluoro- and polyfluoro-compounds can best be incorporated in the ATHS program and risk assessment procedures, noting that these groups seem to represent a new category of toxic air contaminant (TAC) where exposures are primarily indirect, i.e., through migration and deposition to soil and water supplies, rather than through direct inhalation. We assume this question could have implications for subsequent determinations of health values and cancer potency factors for PFAS substances.

In general, CCEEB supports the statutorily defined process for AB 2588 where OEHHA, at the request of ARB and with review by the SRP, evaluates substances and identifies those found to be TACs [Health & Safety Code Section (§) 39660], and then establishes guidelines for health risk assessments, including health values and cancer potency factors for individual compounds [H&SC § 44360(a)(2)]. However, we recognize that updates to ATHS guidelines for reporting (ARB) and health risk assessment (OEHHA) are long overdue, and that efforts must be made to quickly, efficiently, and accurately amend program guidelines. We believe the SRP can provide an important function by helping to define priorities based on H&SC § 39660(f) factors, i.e., “factors related to the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community.” We appreciate and thank you for your work.

Sincerely



Janet Whittick
CCEEB Policy Director

Attachment: CCEEB Comments to ARB on Proposed Amendments to the AB 2588 Emission Inventory Criteria and Guidelines Regulation, Dated May 21, 2020.

cc: Mr. David Edwards, ARB
Mr. Gregory Harris, ARB
Ms. Beth Schwehr, ARB
Dr. John Budroe, OEHHA
Mr. Bill Quinn, CCEEB
Ms. Kendra Daijogo, The Gualco Group, Inc. and CCEEB consultant