



Californians For
Pesticide Reform



June 24, 2019

Scientific Review Panel on Toxic Air Contaminants
Air Resources Board
Mail: P. O. Box 2815
1001 "I" Street
Sacramento, California 95812

Via: jim.behrmann@arb.ca.gov

Dear Members of the Scientific Review Panel:

We note that an update on the AB 617 program is on the agenda for your meeting this week. We are writing to urge the Panel to support the need to include specific pesticide emission reduction strategies in the community emission reduction plans for Shafter (Kern County), South Central Fresno and possibly El Centro/Heber/Calexico (Imperial County). This would include addressing pesticide emission reductions in AB 617 technical assessments prepared by CARB and the Air District and enforceable strategies in the Community Emission Reduction Plan (CERP) to ensure reductions in any criteria air pollutant or TAC from agricultural sources.

Parts of South Central Fresno and Shafter are situated in areas of very high agricultural pesticide use. Within the new South Central Fresno boundary, the soil fumigants and toxic air contaminants 1,3 Dichloropropene (1,3 D), metam potassium, and chloropicrin were used in significant amounts (11,896 pounds, 11,451 pounds, and 10,593 pounds respectively) according to 2016 data.¹ 1,3 Dichloropropene, the insecticide chlorpyrifos and the fungicide mancozeb were the most heavily used pesticides designated as toxic air contaminants used in the Shafter area in 2016.²

Some emissions data for Shafter are readily available because the Department of Pesticide Regulation (DPR) and the California Air Resources Board (CARB) have

¹ CEHTP Agricultural Pesticide Mapping Tool, found at <https://trackingcalifornia.org/pesticides/pesticide-mapping-tool>

² DPR 2016 Pesticide Use Report data

conducted air monitoring for pesticides at the Shafter High School since 2011 and the site has recently been relocated to nearby Sequoia Elementary School. Pesticides monitored include 1,3 D and chlorpyrifos but not mancozeb. DPR has also recently stated that it would use modeling to estimate pesticide emissions in the Shafter area, starting with organophosphate and soil fumigant pesticides³.

However, we are concerned that pesticides may be left out of AB 617 emission reduction strategies for Shafter and South Central Fresno. This is of great concern to us because of ample evidence of emissions of 1,3 D that pose high cancer risk. The average air level of 1,3 D documented at the Shafter High School by the end of 2018 exceeded 0.39 ppb. This is more than double the 0.14 ppb level that DPR previously estimated resulted in a cancer risk of 1 in 100,000⁴. OEHHA still supports this estimate and in fact concludes that the level of concern for children should be 0.1 ppb. As detailed in the attached fact sheet we prepared for the Shafter community, in January of 2018 a record 24-hour average air level of 50.5 ppb was measured at Shafter High School. The average level for the first 3 months of 2018 was 5.6 ppb, almost twice DPR's seasonal screening level of 3 ppb set to prevent damage to the lining of the nasal cavity. DPR linked this extremely high air level to a large untarped application about 650 feet from the school. This violates the ¼ mile buffer required around schools but the buffer zone required for residences is only 100 feet and there is no required buffer zone for fields where workers are laboring. These monitoring results illustrate the urgent need to include pesticide emission reductions in the community emission reduction plans for Shafter, South Central Fresno, and possibly El Centro/Heber/Calexico.

Please contact us if you would like further information.

Sincerely,



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³ https://www.cdpr.ca.gov/docs/dept/prec/2019/031519_pesticide_info_air.pdf

⁴ Last year DPR issued a 1,3 D Risk Management Directive that revised the cancer risk level of concern to 0.56 ppb using a revised estimate of cancer potency based on portal of entry rather than systemic effects. OEHHA does not agree with this revision.

A handwritten signature in black ink that reads "Sarah C. Aird". The signature is written in a cursive, flowing style.

Sarah C. Aird

Co-Director

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