

**Additional Information and Comments to the California Air Resources Board on the
Draft 2026 Roadmap to Reduce Air Toxics
Submitted by California Communities Against Toxics and Earthjustice
(September 16, 2026)**

California Communities Against Toxics and Earthjustice have joined other environmental, health, and community nonprofit organizations and individual scientists to submit separate comments urging the California Air Resources Board (CARB) to strengthen and expand the *Draft 2026 Roadmap to Reduce Air Toxics* to protect all children, families, and communities in California from hazardous air pollution. See Main Comments of California Communities Against Toxics *et al.* (Main Comments). This document serves as an addendum to provide additional information that CARB should also review and consider as part of developing the next version of the *Roadmap*.

As CARB acknowledges, toxic air can cause serious health impacts – from cancer, neurological, developmental, and endocrine effects, to heart, respiratory, and other illnesses. Science shows particular impacts to children and impacts in communities overburdened by pollution and sources, when there is toxic exposure early – e.g., in infancy, childhood and adolescence – and during pregnancy. This pollution and the science on its impacts have been outpacing the steps that CARB has already taken. There is a strong need for more, faster action to protect communities in California as generational cycles of harm continue and repeat in this state.

The urgency of this need has only increased as the federal government tries to go backward on toxic air – by rescinding, weakening, granting corporate exemptions, and stalling progress on clean air standards.ⁱ The current federal government pays lip service to protecting children’s health and “making America healthy” while doing the opposite – dismantling science and agency programs as well as air, chemical safety, and other protections, without even recognizing the impacts on children’s health.ⁱⁱ

The *Draft Roadmap* includes important goals and plan components, but it omits essential areas for action that are vital for a meaningful 20-year plan – as discussed in the Main Comments and in more detail below. It also fails to acknowledge or recognize some of the key scientific research available now to do more than the draft provides on cumulative health risk assessment, prevention of exposure and harm, fence-line monitoring, addressing serious gaps in regulation of chemicals and sources, and preparing to address the new technologies and developments that are emerging. While supporting key improvements discussed in the *Draft Roadmap*, in this additional comment, we supplement the Main Comment and provide some additional sources and key areas where action, focus, or clarity are needed to ensure meaningful protection cancer and other air pollution hazards can finally someday reach all Californians. We urge you to ensure the final roadmap shows all communities a pathway to finally breathe free from toxic air.

We also recommend that CARB provide a longer and more meaningful opportunity for community engagement and public comment than was possible on the *Draft Roadmap*. For the next version of the *Roadmap*, we hope CARB will ensure a meaningful additional opportunity for public comment and for input from the CalEPA OEHA and other experts that is at least 60 days. For a document this central to chart progress on clean air for Californians for decades to come, additional time and input will be important as CARB moves forward.

Thank you for your time and consideration. If you have any questions or would like additional information, please contact: California Communities Against Toxics – Jane Williams, dcapiane@aol.com and Earthjustice – Emma Cheuse, echeuse@earthjustice.org and Michelle Mabson, mmabson@earthjustice.org.

ADDITIONAL INFORMATION AND COMMENTS

1. Children's health and early developmental exposure

Stronger government action by CARB on toxic air focusing on protecting children's health is important to ensure a healthy start and future for all children in our state. Scientific evidence and increasing incidence of illnesses and health conditions in childhood and early adulthoodⁱⁱⁱ show a strong need to prevent early chemical exposure, including during pregnancy, infancy, childhood, and adolescence, and to better protect against cancer and other chronic and acute illnesses and health conditions (including endocrine disruption, teratogenic, mutagenic, neurotoxic, reproductive, developmental effects and more).^{iv}

Children are uniquely susceptible to hazardous chemicals and pollutants, as robust science has shown^v and as CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have recognized.^{vi} For example, children intake more environmental contaminants for their body weight, leading to higher doses of exposure, and are still developing organ systems that can be detrimentally affected by harmful chemicals. Prenatal and early childhood chemical exposures, including through inhalation and pathways of exposure to TAC deposition into dust, soil, and water, contribute to serious childhood morbidity and mortality and other health conditions throughout life in communities in California.^{vii} Research also shows that pollution impacts on maternal health can cause serious developmental and other impacts to children's health.^{viii}

Federal protection is going in the wrong direction and progress has basically stalled on children's health, including when it comes to toxic air. There is a 1994 executive order on children's health.^{ix} The U.S. Environmental Protection Agency (EPA) has long had a Children's Health Policy and an independent federal advisory committee on children's health protection that has made important recommendations to EPA on ways to protect children's health from toxic and other air pollution.^x

Yet under the current administration, EPA recently ended or weakened scientific research on air pollution and children's health,^{xi} and has weakened its Children's Health Policy, suggesting that the agency can ignore it in some instances, and deleted parts of the policy.^{xii} Across administrations, EPA has often failed to fully implement the recommendations of the Children's Health Protection Advisory Committee on the need to strengthen protection for children's health from cumulative risks and impacts from chemicals in air, including during extreme weather events.^{xiii} Similarly, the President's Task Force on Environmental Health Risks and Safety Risks to Children has subcommittees on chemical exposures, lead, asthma, and children in emergencies and disasters such as hurricanes, floods, wildfires, extreme heat and cold, earthquakes and more, but has rarely turned that coordination into actual protection for children's health.^{xiv}

CARB should ensure children's health becomes a central, guiding metric and goalpost in regulating TACs and setting air standards and safeguards for human health that ensure protection for children. Designing environmental health safeguards with children's health in mind would make vital progress toward CARB's goals in the *Draft Roadmap* and toward health protection

for all. This also would help end the cycle of injustice in communities facing the worst impacts over time from pollution and chemical exposure.

Therefore, CARB should ensure that the final Roadmap hardwires children's health into its design and action goals, and translates important scientific research into on-the-ground health protection. This will help reduce preventable chemical exposure during pregnancy, infancy, childhood, and adolescence and ensure stronger regulations and other policies that can finally break the cycle of generations of children breathing toxic air, particularly in the most exposed communities and populations.

In addition to evaluating and seeking comment on all of the best available science on children's health and toxic air,^{xv} and on the types of policy examples noted in the Main Comment, CARB should also coordinate and work with other relevant local jurisdictions and state and federal agencies to protect children's health, to further demonstrate the strong, most current scientific evidence showing the need for such protection, and to evaluate a set of policy tools and solutions that will make vital progress on toxic air and children's health during the coming decades. As an example, CARB should evaluate, with other relevant jurisdictions, ways to establish or update land-use restrictions, buffers, or other safeguards that prevent the siting of family- and child-centric locations such as schools, daycares, parks, playgrounds, community centers, and homes near hazardous sources, and vice versa.^{xvi}

2. Additional Sources of Information on Other Topics Addressed in the *Main Comment*

Emission Testing and Monitoring

As discussed in the Main Comment, CARB should strengthen the monitoring, emissions inventory, modeling, and research tools as proposed in the *Draft Roadmap*. CARB must strengthen the assessment and reporting of TAC emissions, including by ensuring updated emission factors where modeling or estimates are used, and by creating a plan to require emission testing and monitoring at all air toxics emitting sources in binding rules and permits.

Emission estimates and modeling can be valuable tools, but research has repeatedly shown that actual testing and monitoring are vital to groundtruth and evaluate the full picture of what sources are emitting. For example, EPA's and California monitoring requirements for petroleum refineries have shown much higher actual emissions had been than what was being reported for years before those requirements took effect.^{xvii} ProPublica recently released a new study showing how vital monitoring is to assess the actual emissions of toxic air pollutants from a variety of sources.^{xviii}

CARB must expand its air toxics monitors across all communities in the state with sources of TACs, prioritizing areas with the greatest number of sources that families and children are exposed to, and in regions with the greatest potential burden from chemical exposure. The existing number of monitors is woefully inadequate and a lack of information continues to delay and stall meaningful progress on clean air. CARB should deploy the best available monitoring, including mobile monitoring platforms, to maximize the monitoring data, accessibility, and availability of current data on toxics in the air in communities around the state.

On fenceline monitoring, CARB should recognize that both its rules and monitoring system are behind the curve. In addition to strengthening the monitoring system, the final roadmap should

include a plan to incorporate requirements for fenceline monitoring into all applicable air toxics standards and permitting requirements. This should ensure that all California communities exposed to toxic air get the benefits of the use of the best available fenceline monitoring, including real-time monitoring where available. Currently only a small number of communities have the benefit of information or protection that fenceline monitoring creates – e.g., those near petroleum refineries and certain lead emitters.^{xxix} Many others have been promised this protection from national air toxics standards that EPA has issued in recent years that are not yet fully in effect at this time or that only apply in some places, e.g., under individual facility-by-facility agreements or court orders resulting from settlements or enforcement actions.^{xxx} It is vital that the final Roadmap include a plan to bring fenceline monitoring to all Californians exposed to toxic air.

CARB should evaluate and work with CalEPA, CalDPR and other relevant agencies to evaluate and implement broader and more real-time air monitoring, including at more chemical facilities that use, store, or manage extremely hazardous substances,^{xxxi} and at agricultural facilities to prevent and address exposure to pesticides.^{xxiii} CARB should also find ways to continue expanding the use of fenceline and air monitoring at the current time when federal funding is being cut, other states are seeking to prevent or reduce the use of air monitoring by communities, and the importance of accurate information on toxics in the air continues to be critical for health and communities' right and need to know what they and their families are breathing.^{xxiii}

Unregulated or insufficiently regulated toxic air contaminants and industry sectors

As part of creating a framework and plan to address what CARB calls “emerging air toxics of concern,” CARB should ensure consideration of: children’s health, and short-term exposure and harm, including exposure related to chemical emergencies and disasters, as discussed above.

CARB should also evaluate and consider addressing such toxics as classes or groups of chemicals, and not only one-by-one, which increases delay in meaningful protection. Where there is evidence of harm, from short or longer term exposure, including potential harm during pregnancy or childhood, CARB should evaluate ways to prioritize prevention of exposure to protect health while evaluation of “emerging” issues is happening. Again, preventing and reducing exposure is vital to prevent children, families, and communities facing air pollution now, while emerging issues can be fully evaluated and addressed.

Though not new in terms of exposure, in the category of “emerging” due to a lack of current meaningful regulation or health protection, there are at least two categories that include toxic chemicals where science shows a strong need to prevent air pollution and exposure now: **perfluoro-alkylated substances (PFAS)**, and **plastics**. Notably, EPA previously committed to further research and address PFAS in air, including through strengthening the availability of emissions data, and also has received a petition to list PFAS as a hazardous air pollutant, but has not yet taken any action on these steps.^{xxiv} The Children’s Health Protection Advisory Committee recently released recommendations to EPA on the need to protect children’s health from plastics exposure, but so far EPA has done nothing to act on those recommendations.^{xxv} In July 2026, the United Nations Special Rapporteur on Toxics and Human Rights released a new report on PFAS.^{xxvi}

CARB should ensure an efficient and prompt listing and regulatory procedure for unregulated toxic air pollutants, to end the delay in protection for communities currently breathing and exposed to these chemicals in California.

In addition, CARB should evaluate and ensure monitoring, research, and public transparency on industry sectors where evidence continues to grow on the toxic air and harm they can cause, including:

- Pyrolysis and so-called “chemical recycling” of plastics^{xxvii}
- Data centers.^{xxviii}

Data Transparency and Public Access to Information

We strongly support expanding data transparency and public access to emissions and air pollution-related information as the *Draft Roadmap* proposes, including in multiple languages. Californians currently face toxic air that is completely unregulated in part due to a lack of monitoring, health assessment, or action by CARB. In addition to prioritizing action on known and listed TACs, CARB should ramp up emission testing, air monitoring, and research on chemicals that are in the air in California but are currently not being regulated at all – and where communities currently have neither information nor protection for their health.

CARB should add indicators related to maternal health, pregnancy and birth outcomes, and children’s health into its tools. CARB should link information in its tools with information available through Cal. EnviroScreen and other air pollution and environmental information so that communities in California have the best available information on air pollution and related impacts all in one place.

Notes

ⁱ See, e.g. EPA Launches Biggest Deregulatory Action in U.S. History (Mar. 12 ,2025), <https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history>; EPA NESHAP “Powering” Fact Sheet (March 2025), https://www.epa.gov/system/files/documents/2025-03/neshap_powering-the-great-american-comeback_fact-sheet_1.pdf (announcing list of air toxics standards that Administrator Zeldin has directed EPA to work to rescind, weaken or roll back).

ⁱⁱ See Earthjustice, MAHA Lies (2025), <https://earthjustice.org/feature/trump-maha>; CAP Report, How the Trump Administration’s Embrace of Oil, Gas, and Chemical Industry Interests Will Endanger Children’s Health (Feb. 4, 2026), <https://www.americanprogress.org/article/how-the-trump-administrations-embrace-of-oil-gas-and-chemical-industry-interests-will-endanger-childrens-health/>; Earthjustice, Chemical Lobbyists Are Asking For A License to Pollute: Here’s How We Protect Kids Instead (2025), <https://earthjustice.org/experts/michelle-mabson/chemical-lobbyists-are-asking-for-a-license-to-pollute-heres-how-we-protect-kids-instead>; NYU IPI, Tracking the Damages of Regulatory Rollbacks, <https://policyintegrity.org/tracking-regulatory-rollbacks> (last updated Apr. 20, 2026).

ⁱⁱⁱ See, e.g., Nat’l Cancer Inst., Adolescents and Young Adults with Cancer, <https://www.cancer.gov/types/aya> (updated May 8, 2025) (citing data on increasing cancer rates from 2013-22 among adolescents and young adults).

^{iv} See, e.g., Aithal, SS, Sachdeva, I & Kurmi, OP 2023, Air quality and respiratory health in children, *Breathe* (Sheffield, England), vol. 19, no. 2, 230040. <https://dx.doi.org/10.1183/20734735.0040-2023>; Brumberg HL, Karr CJ, AAP Council on Env’tl. Health, Ambient Air Pollution: Health Hazards to Children. *Pediatrics*,

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<https://publications.aap.org/pediatrics/article/147/6/e2021051484/180283/>; Dzubow, R. et al., Comparison of carcinogenic potency across life stages: implications for the assessment of transplacental cancer risk, *J. Toxicol. Environ. Health A.*; 82(13):769-787. doi: 10.1080/15287394.2019.1650860. Epub 2019 Aug 11, <https://pmc.ncbi.nlm.nih.gov/articles/PMC7066594/>; *see also e.g.*, Martin et al., Effects of combined prenatal exposure to air pollution and maternal stress on immune and dopaminergic gene expression in the gut-brain axis, *Brain Behav Immun Health*. 2025 Dec 22;51:101165. doi: 10.1016/j.bbih.2025.101165, <https://pmc.ncbi.nlm.nih.gov/articles/PMC12813338/>; Lee *et al.*, Prenatal fine particulate exposure and early childhood asthma: Effect of maternal stress and fetal sex, *J. of Allergy & Clinical Immunology* (Aug. 8, 2017), 141(5):1880-1886 <https://doi.org/10.1016/j.jaci.2017.07.017>; Herting et al., Outdoor air pollution and brain development in childhood and adolescence, *Trends in Neurosciences* (July 24, 2024), 47(8):593-607, <https://doi.org/10.1016/j.tins.2024.06.008>, <https://europepmc.org/article/MED/39054161>.

^v *See, e.g.* ; EPA, Children's Unique Vulnerabilities to Environmental Hazards, <https://www.epa.gov/children/childrens-unique-vulnerabilities-environmental-hazards> (last updated Sept. 8, 2026); EPA, America's Children and the Environment, <https://www.epa.gov/americaschildrenenvironment> (last updated Aug. 24, 2026).

^{vi} *See, e.g.*, CARB, Children's Health (2026) (citing research showing "children are often at greater risk from inhaled pollutants than adults" in part due to unique activity patterns and behavior and biological processes during human development, recognizing "Environmental exposures during fetal development, the first few years of life, and puberty have the greatest potential to influence later growth and development"), <https://ww2.arb.ca.gov/our-work/programs/childrens-health>; *see also* Cal. EPA OEHHHA, Children's Environmental Health Center, <https://oehha.ca.gov/risk-assessment/childrens-environmental-health-center> (last viewed Sept. 8, 2026).

^{vii} *See e.g.*, Aithal, SS, Sachdeva, I & Kurmi, OP, Air quality and respiratory health in children, *Breathe*, vol. 19, no. 2, 230040 (2023), <https://dx.doi.org/10.1183/20734735.0040-2023>; Brumberg HL, Karr CJ, *et al.*, *Am. Acad. of Pediatrics, Council on Environmental Health, Ambient Air Pollution: Health Hazards to Children*, *Pediatrics*, 147(6) (2021), e2021051484, <https://publications.aap.org/pediatrics/article/147/6/e2021051484/180283>.

^{viii} *See, e.g.*, Lane, M. et al. The Effects of Air Pollution on Neurological Diseases: A Narrative Review on Causes and Mechanisms. *Toxics* 2025, 13, 207. <https://doi.org/10.3390/toxics13030207>.

^{ix} Exec. Order 13045, Protection of Children from Environmental Health Risks and Safety Risks (Apr. 21, 1997), <https://www.govinfo.gov/content/pkg/FR-1997-04-23/pdf/97-10695.pdf>.

^x *See, e.g.*, M. Sullivan et al., The EPA's Commitment to Children's Environmental Health: History and Current Challenges, *Am. J. Pub. Health* (Jan. 2022), <https://pmc.ncbi.nlm.nih.gov/articles/PMC8713602/>; Children's Health Protection Advisory Committee (CHPAC), <https://www.epa.gov/children/childrens-health-protection-advisory-committee-chpac> (Meeting Agendas and Comment Letters).

^{xi} *See, e.g.*, A. Wittenberg, RFK Jr. wants more air pollution research, but EPA shut down its lab, *E&E News* (Sept. 10, 2025), <https://www.eenews.net/articles/rfk-jr-wants-more-air-pollution-research-but-epa-shut-down-its-lab/>; <https://www.thenewlede.org/2025/07/qa-a-feared-return-to-the-dark-ages-of-science-seen-in-epas-dismantling-of-research-unit/>.

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- ^{xii} Compare EPA 2026 Policy on Children’s Health with EPA 2021 Policy on Children’s Health at <https://www.epa.gov/children/childrens-health-policy-and-plan> (last updated May 12, 2026).
- ^{xiii} See Comments of CCAT *et al.* to CHPAC (Aug. 2025), <https://www.regulations.gov/comment/EPA-HQ-OA-2025-0261-0005>.
- ^{xiv} See President’s Task Force on Environmental Health Risks and Safety Risks to Children, <https://ptfcehs.niehs.nih.gov/> (last updated Aug. 7, 2026).
- ^{xv} See, e.g., K. O’Shaughnessy, A. Lorenz, *et al.*, Current progress and research needs to protect children’s environmental health, PNAS (Oct. 1, 2025), <https://www.pnas.org/doi/10.1073/pnas.2522786122>.
- ^{xvi} See, e.g., Y. Mkunyan, Spatial analysis of pollution source proximity to early childhood development centers in Gauteng, Environ Geochem Health. 2025 Dec 20;48(2):62. doi: 10.1007/s10653-025-02941-8, <https://pmc.ncbi.nlm.nih.gov/articles/PMC12718283/>; EPA School Siting Guidelines (2015), https://19january2017snapshot.epa.gov/sites/production/files/2015-06/documents/school_siting_guidelines-2.pdf (providing example guidelines for school siting that take into account the particular vulnerabilities of children to hazardous substances or pollution exposures, among other environmental factors); see also Harvard Kennedy School, Data-Smart City Solutions, Protecting Children’s Health: Near-Roadway Pollution and Playground Planning (Nov. 13, 2023), <https://datasmart.hks.harvard.edu/protecting-childrens-health-near-roadway-pollution-and-playground-planning>; Stefanie Le, Map Monday: Where Traffic Pollution Hurts Children the Most (Apr. 29, 2019), <https://datasmart.hks.harvard.edu/news/article/map-monday-where-traffic-pollution-hurts-children-most> (citing research from Texas A&M University); Amer. Acad. of Pediatrics, FAAP, Tech. report, A. Bole *et al.*, The Built Environment and Pediatric Health, *Pediatrics* (2024), 153(1), <https://publications.aap.org/pediatrics/article/153/1/e2023064773/196211/The-Built-Environment-and-Pediatric-Health>; Roche, IV, Ubalde-Lopez, M, Daher, C, Nieuwenhuijsen, M, & Gascon, M, The Health-Related and Learning Performance Effects of Air Pollution and Other Urban-Related Environmental Factors on School-Age Children and Adolescents-A Scoping Review of Systematic Reviews. (2024) *Current environmental health reports*, <https://doi.org/10.1007/s40572-024-00431-0>.
- ^{xvii} See, e.g., CARB/CAPCOA Refinery Air Monitoring Assessment Report and Appendices (Mar. 2019), <https://ww2.arb.ca.gov/our-work/programs/incident-air-monitoring/refinery-air-monitoring>; EIP, Cancer-Causing Benzene Pollution from U.S. Refineries Down Significantly (May 16, 2024), <https://environmentalintegrity.org/news/cancer-causing-benzene-pollution-from-u-s-refineries-down-significantly/>; EIP, Nearly Half of U.S. Refineries Releasing Benzene at Levels That Could Pose a Long-Term Health Threat (May 12, 2022), <https://environmentalintegrity.org/news/nearly-half-of-u-s-refineries-releasing-benzene-at-levels-that-could-pose-a-long-term-health-threat/>.
- ^{xviii} See L. Song, The EPA Let Companies Estimate Their Own Pollution Levels. We Discovered Real Emissions Are Far Worse, ProPublica (Oct. 30, 2025), <https://www.propublica.org/article/epa-air-pollution-pittsburgh-clairton-coke-works>.
- ^{xix} See, e.g., CARB, Refinery Air Monitoring, <https://ww2.arb.ca.gov/our-work/programs/incident-air-monitoring/refinery-air-monitoring>; S. Coast Air Qual. Mgmt. Dist. Rule 1420.1, Emission Standards for Lead and other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities (adopted Nov. 5, 2010, last amended Sept. 4, 2015),

<https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1420-1.pdf>; *see also* EPA, Enforcement Alert: Benzene Fenceline Monitoring at Petroleum Refineries (Sept. 2025), <https://www.epa.gov/enforcement/enforcement-alert-benzene-fenceline-monitoring-petroleum-refineries>.

^{xx} *See, e.g.*, EPA, 2024 Final Rule, NSPS for the Synthetic Organic Chemical Manufacturing Industry and NESHAP for the SOCM and Group I & II Polymers and Resins Industry, 89 Fed. Reg. 42932 (2024), <https://www.epa.gov/stationary-sources-air-pollution/synthetic-organic-chemical-manufacturing-industry-national>; EPA, 2024 Final Rule, Integrated Iron & Steel Manufacturing, 89 Fed. Reg. 23324 (Apr. 3, 2024), <https://www.epa.gov/stationary-sources-air-pollution/integrated-iron-and-steel-manufacturing-national-emission>; EPA, 2024 Final Rule, Coke Ovens, 89 Fed. Reg. 55684 (July 5, 2024), <https://www.epa.gov/stationary-sources-air-pollution/coke-ovens-batteries-national-emissions-standards-hazardous-air>.

^{xxi} *See, e.g.*, Comments of Attorney General Bonta *et al.* to EPA (May 2026), <https://www.regulations.gov/comment/EPA-HQ-OLEM-2025-0313-0333> (discussing the need for real-time fenceline air monitoring at the most dangerous industrial chemical facilities); *see also* Comments of CCAT *et al.* to EPA (2022) (discussing the need for real-time air monitoring at industrial chemical facilities).

^{xxii} *See, e.g.*, Cal DPR, Monitoring for Pesticides in the Air, <https://www.cdpr.ca.gov/environmental-monitoring/air-monitoring/> (last viewed Sept. 16, 2026).

^{xxiii} *See, e.g.*, A. Alexander *et al.*, America’s air monitors are disappearing, along with the power to expose polluters, Louisiana Illuminator (Sept. 9, 2026), <https://lailluminator.com/2026/09/09/air-monitor-2/>.

^{xxiv} *See, e.g.*, EPA PFAS Strategic Roadmap: EPA’s Commitments to Action, 2021-2024 at 18 (Oct. 2021), https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf; EPA Other Test Method (OTM)-50, available at <https://www.epa.gov/system/files/documents/2025-01/otm-50-release-1-r1.pdf> (Jan. 14, 2025) (which measures up to 30 volatile fluorinated compounds in air); Multistate Petition to Add PFAS Compounds to the List of Clean Air Act Hazardous Air Pollutants (Aug. 29, 2024), <https://www.deq.nc.gov/news/press-releases/2024/08/29/states-ask-epa-designate-several-pfas-hazardous-air-pollutants> (filed by NCDEQ, NMED, NJDEP, PFOA, PFOS, GenX and PFNA as a hazardous air pollutant under Clean Air Act Section 112).

^{xxv} CHPAC Plastics and Children’s Health Letter to EPA Administrator Zeldin (Nov. 4, 2025), <https://www.regulations.gov/document/EPA-HQ-OA-2025-0261-0029>.

^{xxvi} U.N. Human Rights Council, Forever chemicals and human rights (July 6, 2026), <https://docs.un.org/en/A/HRC/63/27>; Comments of Earthjustice *et al.*, Response to Call for Input – Forever Chemicals (PFAS) & Human Rights, Submitted to the Special Rapporteur (Jan. 9, 2026), <https://earthjustice.org/wp-content/uploads/2026/01/2026.1.9-ngo-un-submission-pfas.pdf>.

^{xxvii} *See, e.g.*, Pivato *et al.*, Air-Polluting Emissions from Pyrolysis Plants: A Systematic Mapping, *Environments* (July 11, 2024), 11(7), 149, <https://doi.org/10.3390/environments11070149>; Bay Area Air Quality Management District. Draft Engineering Evaluation CA-002 Somo Village (Resynergi) (2025), https://www.baaqmd.gov/~media/files/engineering/public-notices/2025/704470/fid203504_nsr_704470_eval_071825-pdf.pdf?rev=11ecccc3400042a09b30cd5817e00211&sc_lang=en.

^{xxviii} See, e.g., Env'tl. Prot. Network (EPN), The Hidden Health Costs of AI Data Centers, <https://safernotsicker.org/take-action/the-hidden-costs-of-ai-data-centers/>; see also H. Tabuchi, A.I. Boom Poses Growing Public Health Threat, Former EPA Officials Warn, N.Y. Times (Sept. 10, 2026); Env'tl. & Energy Study Institute (EESI), Data Centers Are Contributing to PFAS Forever Chemical Pollution (Apr. 9, 2026), <https://www.eesi.org/articles/view/data-centers-are-contributing-to-pfas-forever-chemical-pollution>; D. Gayle, 'Tidal wave' of PFAS being launched to satisfy AI industry, campaigners warn, The Guardian, (Sept. 14, 2026), <https://www.theguardian.com/environment/2026/sep/14/pfas-firms-tidal-wave-forever-chemicals-ai-industry-demand-datacentres>.