



South Coast Air Quality Management District

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Dr. Steven Cliff, Executive Officer
California Air Resources Board
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Sacramento, CA 95814

South Coast AQMD Comments Regarding the Draft Roadmap to Reduce Air Toxics

South Coast AQMD appreciates the opportunity to comment on CARB's Draft Roadmap to Reduce Air Toxics (Roadmap). We also appreciate our prior engagement as CARB has developed this draft, both directly with our staff, and through CAPCOA. For over three decades, South Coast AQMD has maintained its focus on addressing air toxics. South Coast AQMD has a multi-faceted air toxics program that includes a robust regulatory program, the AB 2588 Hot Spots program, Multiple Air Toxics Exposure Studies (MATES), permitting, and air monitoring. We fully recognize the importance of addressing air toxics, and appreciate that CARB is looking at air toxics through a new focus in this Roadmap. We stand ready to continue to engage with CARB in this work, and encourage you to use our extensive experience to help guide your efforts.

Given the breadth of the issues related to air toxics, and the considerable work that has been ongoing for many decades at air districts, we recommend that CARB prioritize its air toxics efforts. By prioritizing specific issues, CARB can more readily achieve meaningful successes in areas of need, rather than broad-based work that may be duplicative with ongoing work where air districts are best suited to lead. Below are some suggested priority areas where we believe CARB is uniquely positioned to make meaningful progress.

- Develop workplans for acrolein and ethylene oxide. OEHHA is proposing new cancer risk values for these pollutants, and early estimates indicate newly identified risks from these pollutants may be quite significant. No agency currently evaluates the statewide impacts and needs when OEHHA finalizes a new toxicity factor. CARB is best suited to do this work. This includes developing methods to evaluate and publicly communicate the impact from these pollutants as well as potential

approaches to reduce risk. Specifically, this would include ensuring air monitoring and source testing methods are available for regulatory agencies and industry, developing statewide regulation as appropriate, working with industry to identify near-term risk reduction approaches, engaging with air districts to coordinate approaches, and communicating with the public and government agencies on impacts.

- Identify methods to streamline toxics work, which is inherently technical, complex, and time-consuming. This could include:
 - Developing default emission factors for common toxics emission sources.
 - Developing methods to make the lengthy AB 2588 process faster.
 - Evaluating whether total exhaust stream toxic mixes should be considered instead of pollutant-by-pollutant approaches (e.g., should the approach taken for diesel PM be pursued for non-diesel combustion sources?).
 - Working with OEHHA, air districts, and other key stakeholders to identify which pollutants should be prioritized from a public health basis.
 - Working with air districts and industry to increase the overall capacity in the state to conduct source testing. Nearly all subsequent goals for toxics work will face this key bottleneck.
 - Working with air districts on identifying and validating appropriate air toxics measurement methods.
 - Engaging with experts in other agencies to develop effective risk communication approaches. Development of standard materials, processes, and training would be beneficial for CARB, air districts, and the public.

We appreciate CARB's desire to modernize its toxics program, and look forward to future collaboration. If you have any questions don't hesitate to contact myself or Susan Nakamura at snakamura@aqmd.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Natri", with a stylized, flowing script.

Wayne Natri
Executive Officer
South Coast Air Quality Management District