



South Coast Air Quality Management District

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RE: Comments on SB 673 Draft Regulatory Framework Concepts

Dear Ms. Holmes-Gen:

The South Coast AQMD staff appreciates the opportunity to comment on the SB 673 Draft Regulatory Framework Concepts document. South Coast AQMD staff have been participating in the agency working group meetings as well as other community meetings, and have been engaged with DTSC staff in sharing information on air district efforts in implementing AB 617 community air monitoring and emission reduction plans. We recognize that these concurrent efforts both serve to address cumulative environmental impacts in disadvantaged communities through focused efforts that reduce environmental hazards and risks.

We recognize that the SB 673 regulatory framework is still in the early stages of development and there are many areas where further clarification will be useful. South Coast AQMD staff will continue to participate in the development of SB 673 to assist in the process. At this stage, South Coast AQMD staff would like to highlight some areas where additional detail is needed to better understand what DTSC is conceptualizing in this framework:

- p. 7 – air monitoring data from AB 617 or similar efforts. It is important to note that while AB 617 includes community-level monitoring, much of the monitoring will be focused on investigation of specific facilities within the community. Those types of facility-focused monitoring data would likely not be appropriate to assess general community-level cumulative exposures. Multiple Air Toxics Exposure Study (MATES) data or MATES-like stations that are within the community being assessed, generate more appropriate monitoring data to use for assessing community-level exposures.

It would also be helpful to clarify whether air districts will be asked to provide existing monitoring data and past health risk assessments, rather than conducting additional monitoring, or generating new data or assessments for DTSC's permit evaluation process.

- p. 7-8 – Good Neighbor Agreement. How will DTSC determine which stakeholders need to agree to such an agreement?
- P. 10 – what kind of input are you seeking from South Coast AQMD on the community monitoring network plan?

- p. 10-11 – potential mitigation measures. In general, mitigation actions should prioritize mitigating risks of the facility, including facility emissions as well as risks from hazardous waste and water runoff. We recognize that mitigating community exposures (such as through lead paint abatement or air filtration programs) and community sensitivity (such as through asthma intervention programs) would help to improve public health outcomes. The South Coast AQMD encourages that such actions be done in a coordinated fashion so that the community does not end up with a patchwork of programs that is difficult to navigate.

Here are some specific suggestions or questions regarding the list of potential mitigation measures:

1. The list should distinguish between mitigation measures that directly mitigate risks from the facility operations, and mitigation measures that address community vulnerability and sensitivity.
2. What purpose would the monitoring serve, and who will determine the monitoring objectives and duration?
3. For the community investments, what tie-in would be appropriate to AB 617 priority concerns? There should be a higher priority placed on related emissions reductions, both from facilities and local mobile sources. Other areas, such as indoor air improvements and exposure reduction may also be very applicable, but should be considered as lower priority actions.
4. Would investments in infrastructure projects be applicable?

The South Coast AQMD staff looks forward to continuing the work with DTSC to develop this framework and implement the SB 673 efforts to address cumulative impacts in environmental justice communities.

Sincerely,

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