



South Coast
Air Quality Management District
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November 15, 2017

Dr. Mas Dojiri
Assistant Director
LA Sanitation
1149 South Broadway, 9th Floor
Los Angeles, CA 90015

Dear Dr. Mas Dojiri:

Comment Letter for the City of Los Angeles Bureau of Sanitation
Industrial Waste Management and Regulatory Affairs Division's
Report to Council Motion 17-0997

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the City of Los Angeles Bureau of Sanitation Industrial Waste Management and Regulatory Affairs Division's Report to Council Motion 17-0997 dated October 18, 2017 referred to herein as the "Draft October Report." The SCAQMD staff commends the City of Los Angeles on taking proactive steps to identify and address potential sources of hexavalent chromium that may impact communities within the city. As the City of Los Angeles embarks on this ambitious project, the SCAQMD staff is providing comments to ensure the city is well informed of SCAQMD current and future regulatory activities and programs to address community air toxics.

The SCAQMD has a robust air toxics regulatory program with additional rules being developed and strengthened to further reduce hexavalent chromium emissions. Under the SCAQMD's Rule 1401, all new and modified sources are reviewed for potential air toxics and must meet specific health risk thresholds. In addition, SCAQMD Rule 1402 which implements the AB2588 Hot Spots Program, establishes facility-wide health risk thresholds that individual facilities must meet. Regarding rules that target a specific source category, the SCAQMD has existing source-specific rules to control hexavalent chromium emissions from chromium electroplating and chromic acid anodizing and associated operations (Rule 1469), cooling towers (Rule 1404), cement manufacturing facilities (Rule 1156), earth-moving activities with soils containing toxic air contaminants (Rule 1466), and chromium spraying operations (Rule 1469.1). The

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SCAQMD is proposing new rules to further address hexavalent chromium emissions from heat treating (Proposed Rule 1435), metal melting (Proposed Amended Rule 1407), and laser-arc cutting operations (Proposed Rule 1445). The SCAQMD staff believes that a comprehensive regulatory program is the most efficient way to reduce hexavalent chromium emissions to provide the greatest public health protection.

As described in the City of Los Angeles' Draft October Report, the SCAQMD is implementing a Community Air Toxics Initiative in Compton and is in the initial stages of implementing Assembly Bill 617. As one of the elements to implement AB 617, the California Air Resources Board (CARB) with SCAQMD will be developing an ambient monitoring work plan to address a number of different types of sources and toxic air contaminants. Proposed Rule 1480, the proposed ambient monitoring rule, is scheduled for adoption in 2018. Since rule development for Proposed Rule 1480 has not yet been initiated, the SCAQMD staff has not established any ambient standard for hexavalent chromium or any other toxic air contaminant. The City of Los Angeles' Draft October Report references "hexavalent chromium ambient air quality standards." However, SCAQMD however, is not aware of such a standard, on either the local, state or federal level.

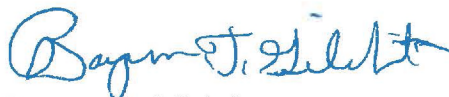
Another element of AB 617 will be identifying potential communities where air monitoring can be conducted. The Draft October Report identifies potential areas where the City of Los Angeles will be investigating potential hexavalent chromium businesses. The SCAQMD staff agrees that the proximity to residential and sensitive receptors should be one of many criteria. In addition to assessing those businesses that are within 1 mile of a residential or sensitive receptor, closer distances are also important as health risks are much greater closer to the source. In estimating health risks, the SCAQMD as well as other air agencies throughout California, rely on the methodology established by the California Office of Environmental Health Hazard Assessment (OEHHA). In 2015, OEHHA revised its health risk estimation methodology to account for child-specific factors. The 2015 OEHHA health risk methodology increases the estimated cancer risk by about 6 times for toxic metals such as hexavalent chromium for residential and sensitive receptors, compared to the previous health risk methodology. In general, health risks tend to drop-off at approximately 500 feet from the source. Thus, identifying those businesses that are critically close to residential and sensitive receptors should be a key consideration.

In summary, these are some of the major issues we see with your draft report:

- The SCAQMD is not aware of a "hexavalent chromium ambient air quality standard";
- The draft report contains an incomplete description of the SCAQMD's rules and comprehensive regulatory program; and
- A shorter distance than 1 mile should be used for prioritizing facilities.

Based on our current monitoring and inspection efforts in Paramount and Compton, the SCAQMD staff is interested in sharing lessons learned so the City of Los Angeles can begin its own air monitoring efforts. As the SCAQMD staff mentioned during our meeting with representatives from the Bureau of Sanitation on October 11, 2017, our limited monitoring resources are already committed to Paramount, Compton, the Community Air Toxics Initiative, and preparing to comply with AB 617. There may be community monitoring opportunities through implementation of AB 617. However, the program is still in the early stages of development. The SCAQMD staff can provide information regarding monitoring equipment, monitoring and sampling protocols, and certified and qualified laboratories to assist the City of Los Angeles in their own air monitoring efforts. If you have any questions, please call Assistant Deputy Executive Officer, Marian Coleman at (909) 396-2415.

Sincerely,



Bayron T. Gilchrist
Deputy Executive Officer
Compliance and Enforcement

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CC: Jim Marchese, Assistant Division Manager, LA Sanitation