



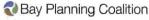
WESTERN AGRICUITURAL PROCESSORS











MANUFACTURERS & TECHNOLOGY





















California Construction and

Immetrial Materials Association































































Mr. Gregory Harris California Air Resources Board 1001 | Street Sacramento, California 95812

Subject: Coalition comments on ARB and CAPCOA "Proposed Risk Management Guidance for Stationary Sources of Air Toxics" dated July 13, 2015.



Dear Mr. Harris:











The undersigned groups represent hundreds of California facilities currently subject to state and local air toxics regulations and thousands of additional facilities that may become subject to these programs following implementation of the revised Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, issued by the Office of Environmental Health Hazard Assessment (OEHHA) on March 6, 2015. As ARB and CAPCOA are aware, the OEHHA document includes changes to air toxics risk assessment methodology that will have the effect of increasing facility risk estimates by 1.5-3-fold or more relative to the prior methodology, absent any increases in actual facility emissions.

The Proposed Risk Management Guidance for Stationary Sources of Air Toxics is an improvement over the Discussion Draft in terms of providing further clarification of policy choices that will drive increases in facility risk estimates. This document also provides useful additional context for understanding risk estimates in practical terms and the magnitude of facility-specific estimates relative to background health risks. We continue to question the utility of these guidelines for informing certain critical decisions, such as permitting a facility above local air district regulatory thresholds based on extenuating circumstances. However, we support other changes reflected in this document, especially CAPCOA's decision to invite stakeholders to participate in updating two

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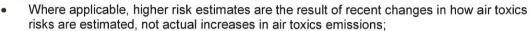


important air toxics program implementation documents – CAPCOA's 1992 Facility Prioritization Guidelines and its 1992 Public Notification Guidelines.



As we noted in our comments on the Discussion Draft, the public should be informed that expected increases in facility risk estimates and new notifications will be due predominantly to changes in risk assessment methodology, not actual increases in facility air toxics emissions. Dated messaging and notification templates developed under a different health risk policy paradigm would lead to unnecessary public alarm by promoting the false perception that recent actions taken by the facility and the air district have resulted in increased health risk to nearby residents. The updated Public Notification Guidelines should include new facility and industrywide sample notification letters emphasizing the following messages consistent with statements in the Proposed Risk Management Guidelines:







 Air toxics emissions have decreased dramatically over the past 30 years due to state and local regulatory programs and improvements in air toxics emission control technology;



Risk estimates are not a bright line between safety and danger;



Facility health risk estimates are small relative to background health risk.



In addition, since many individuals will be receiving notices for the first time, the updated Public Notification Guidelines should recommend a more user-friendly question and answer format with additional background information describing what health risk is and how it is measured.



Thank you for the opportunity to comment on the Proposed Risk Management Guidance for Stationary Sources of Air Toxics. We look forward to working with ARB and CAPCOA on updating the 1992 Public Notification Guidelines and on implementing other elements of the air toxics program work plans reflected in this Guidance.

Sincerely,



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Anthony Samson
Policy Advocate
California Chamber of Commerce



On Behalf of the Following Organizations:

African-American Farmers of California



Agricultural Council of California
Almond Hullers and Processors Association
American Chemistry Council
Associated General Contractors- California



Associated General Contractors- San Diego
Bay Area Council
Bay Planning Coalition



Big Bear Chamber of Commerce
Building Industry Association of Fresno and Madera Counties

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California Association of Sanitation Agencies California Attractions and Parks Association

California Building Industry Association

California Business Properties Association

California Cement Manufacturers Environmental Coalition

California Citrus Mutual

California Construction and Industrial Materials Association

California Cotton Ginners Association California Cotton Growers Association California Farm Bureau Federation

California Fresh Fruit Association California Hospital Association

California League of Food Processors

California Manufacturers and Technology Association

California Metals Coalition

California Refuse Recycling Council California Small Business Alliance

California Society for Healthcare Engineering, Inc.

California Trucking Association Can Manufacturers Institute

Cathedral City Chamber of Commerce

Cerritos Chamber of Commerce

Chambers of Commerce Alliance of Ventura and Santa Barbara Counties

Chemical Industry Council of California

Coastal Energy Alliance

Construction Industry Air Quality Coalition

Culver City Chamber of Commerce

Dairy Cares

Delano Chamber of Commerce Dinuba Chamber of Commerce Elk Grove Chamber of Commerce

El Monte/South El Monte Chamber of Commerce

Folsom Chamber of Commerce Gateway Chambers Alliance

Greater Bakersfield Chamber of Commerce Greater Riverside Chamber of Commerce

Hayward Chamber of Commerce Indio Chamber of Commerce

Industrial Association of Contra Costa County

Industrial Environmental Association Industry Manufacturers Council Inland Empire Economic Partnership

Irvine Chamber of Commerce Kern County Farm Bureau

Kern County Taxpayers Association

Laguna Beach Chamber of Commerce Lodi Chamber of Commerce

Los Angeles Area Chamber of Commerce

Los Angeles County Business Federation

Malibu Chamber of Commerce

Manufacturers Council of the Central Valley Metal Finishing Association of Northern California Metal Finishing Association of Southern California

Milk Producers Council

NAIOP- Southern California

National Federation of Independent Business

































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LAGUNA BEACH





National Tank Truck Carriers, Inc.

Nisei Farmers League

North Orange County Chamber of Commerce

Norwalk Chamber of Commerce

Ontario Chamber of Commerce

Orange County Business Council

Pasadena Chamber of Commerce

Rancho Cordova Chamber of Commerce Richmond Chamber of Commerce

Rural County Representatives of California

Sacramento Metropolitan Chamber of Commerce

San Bernardino County Solid Waste Management Division

San Diego Regional Chamber of Commerce

San Francisco Chamber of Commerce

San Gabriel Valley Legislative Coalition of Chambers

San Gabriel Valley Economic Partnership

San Jose Silicon Valley Chamber of Commerce

San Rafael Chamber of Commerce

San Ramon Chamber of Commerce

Seawright Custom Precast

Solid Waste Association of North America

Southwest California Legislative Council

Southwest Riverside County Association of Realtors

Styrene Information & Research Center

Torrance Area Chamber of Commerce

Tulare Chamber of Commerce

Tulare Kings Hispanic Chamber of Commerce

Valley Industry and Commerce Association

West Coast Lumber & Building Materials Association

Western Agricultural Processors Association

Western Growers

Western Plant Health Association

Western States Petroleum Association

Western United Dairymen

Western Wood Preservers Institute

Wilmington Chamber of Commerce

cc: Matthew Rodriquez, Secretary, California Environmental Protection Agency Richard Corey, Executive Officer, California Air Resources Board Richard Stedman, President, California Air Pollution Control Officers Association Alan Abbs, Executive Director, California Air Pollution Control Officers Association