



April 14, 2021

Liane Randolph, Chair  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**RE: Sierra Club California Comments on Air Resources Board Toxic Air Rules**

Dear Chair Randolph and Members of the Board:

Sierra Club California strongly supports the California Air Resources Board's (CARB) efforts to control toxic air pollution in the state. We are pleased that CARB is proposing key ways to strengthen two bills, the "Criteria and Toxics Reporting" rules and AB 2588 Air Toxics "Hot Spots" program. The proposed rules expand the number of chemicals regulated as air toxics and bring new industries into regulation - particularly in communities most impacted by industrial pollution.

However we would like to see the rules strengthened to allow for better tracking and tighter restrictions on toxic chemicals that impact the state residents most harmed by pollution.

Many of the new chemicals added to the air toxics list do not have derived "health values" or risk-based limits. The state will not require reporting for emissions of these chemicals, which is problematic, because reporting information could help CARB identify hot spots and prioritize chemicals for evaluation of health-based limits. Such reporting data could also identify pollution hot spots that warranted emergency action. There is no defensible reason to stall emissions reporting for chemicals without health-based limits.

The proposed rule for air toxics also fails to consider the cumulative impacts of pollution from multiple sources. As you well know, people are exposed to complex mixtures of different industrial chemicals daily. If the state finalizes rules that ignore multiple exposures it will fail people living in the most impacted areas. Regulations should ideally ensure that the additive stresses of chemicals in outdoor air are safe for children, adults with health conditions that make them more impacted by pollution, and the elderly. We believe that AB 2588 requires the agency to consider multiple stresses. This is common practice when considering criteria pollutants.

In summary, Sierra Club California urges CARB to strengthen its proposed air toxics rules by requiring reporting for chemicals with no health limits, and by reinstating language considering the cumulative toll of air pollution from multiple neighborhood sources.

Sincerely,

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Sierra Club California

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Sierra Club