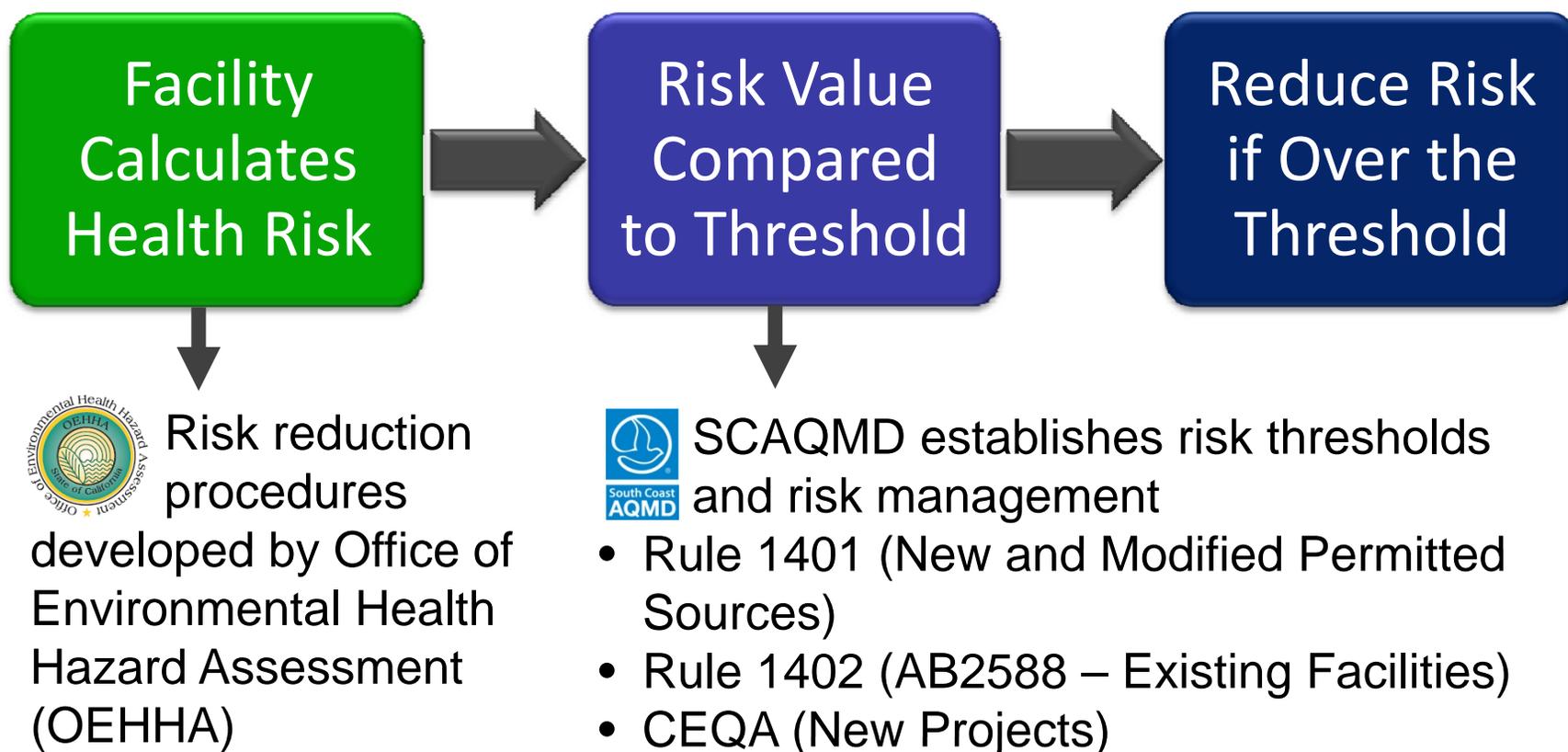


Potential Impacts of New OEHHA Risk Guidelines on SCAQMD Programs

Cleaning the Air That We Breathe...

Overview Agency Responsibilities



OEHHA Guidance - Background

- OEHHA approved Health Risk Assessment (HRA) Guidance in 2003
- Scientific Review Panel (SRP) and OEHHA approved technical support documents
 - 2008 - Noncancer Reference Exposure Levels
 - 2009 - Cancer Potency Factors (age specific factors)
 - 2012 - Exposure Assessment (breathing rates and exposure duration)
- OEHHA revising HRA guidance to incorporate technical support document

OEHHA Risk Guidance Proposed Revisions

Age Specific Factors (2009 Cancer Potency Factors)

- Higher impacts to children

Breathing Rate (2012 Exposure Duration)

- Modified for different ages (e.g., higher for children)

Exposure Duration (2012 Exposure Duration)

- Reduced exposure duration (residential and worker)
- Lowest exposure period reduced from 9 years to 2 months



Result: Residential Risk ~3X Higher*

** Preliminary estimate/subject to change. Up to ~6X for multi-pathway.
Worker risks decline ~2%*

Examples of Increased Risk at 3X's

Example	Cancer Risk from Current Guidelines (per million)	Approximate Risk from New Guidelines (per million)
MATES IV	422	1,266
San Bernardino Rail Yard – Max residential (2008)	2,500	7,500
Gas Station (Costco) – Max residential	15	45

Cancer Burden impacts may be larger (5-10x) than maximum cancer risk impacts

- 1 per million contour limit could extend 2-3x farther



Impact to SCAQMD Risk-Based Programs

- All risk-based programs will be affected
 - New and modified permits (R1401 and 1401.1)
 - Existing facilities (R1402 and some source-specific rules)
 - New projects (CEQA)

Potential Permitting Impacts

Rule 1401

- Number of sources subject to public notification could be high
- Number of sources unable to obtain permits could be high
 - Throughput limits too low to operate
 - Control equipment unavailable or too costly
 - Examples include gas stations, auto body, soil remediation
- Significant increase in permit workload likely
 - Fewer facilities will be able to use screening analysis

Potential Existing Source Impacts

Rule 1402

- Public notices
 - 2 to 3 times more facilities may be required to conduct public notices
 - 5 to 10 times more notices to households
- Risk management
 - ~80 percent of facilities with an HRA may need to update HRA
 - More facilities expected to be subject to risk reduction measures (R1402)
 - Industry-wide categories may be heavily impacted (e.g. >400 gas stations)

CEQA Program Impacts

- Intergovernmental Review
 - 6 months construction impacts from a typical 1-acre office project could cause significant risk
 - 1 lb/day of DPM for 6 months = risk > 10 per million
- Lead agency projects
 - 10 of 16 projects in two year sample period would have needed to upgrade to EIR's
 - Due to construction

Initial Staff Recommendations

- Rely on risk management to address changes in risk assessment methodologies
- Develop statewide toxic communication tools to explain OEHHA procedure changes
- Maximize programmatic risk reduction opportunities through source-specific rulemaking
 - Reduce administrative costs
- Develop a work plan to phase in and to prioritize implementation of the revised OEHHA procedures
 - Explore ways to minimize program implementation costs