

**Proposed Work Plan for  
Implementing the OEHHA's  
Revised Air Toxics Hot Spots  
Program Risk Assessment  
Guidelines**

**SCAQMD Governing Board Meeting  
March 6, 2015**

# OEHHA Revised Risk Guidance

- SB 25 required that the special susceptibility of infants and children be considered in assessing the health risks associated with air toxics
- Office of Environmental Health Hazard Assessment (OEHHA) revising Risk Assessment Guidelines
  - Incorporates new studies on childhood sensitivity
  - Incorporates new data on exposure (e.g. breathing rate and time at home)
- Cancer risk estimates for *residential* exposures will increase ~3 times (some cases 6 times higher)
- Cancer risk estimates for worker exposure no substantial change

# OEHHA Revised Risk Guidelines

## Impact On Cancer Risk



### No Change

Quantification of  
Facility  
Emissions –  
(No Increase in  
Toxic Emissions)



### Revised

Methodology  
for Estimating  
Cancer Risk  
(Childhood  
sensitivities and  
breathing rates)



Residential / Sensitive  
Receptor Cancer Risk  
**(Increased)**



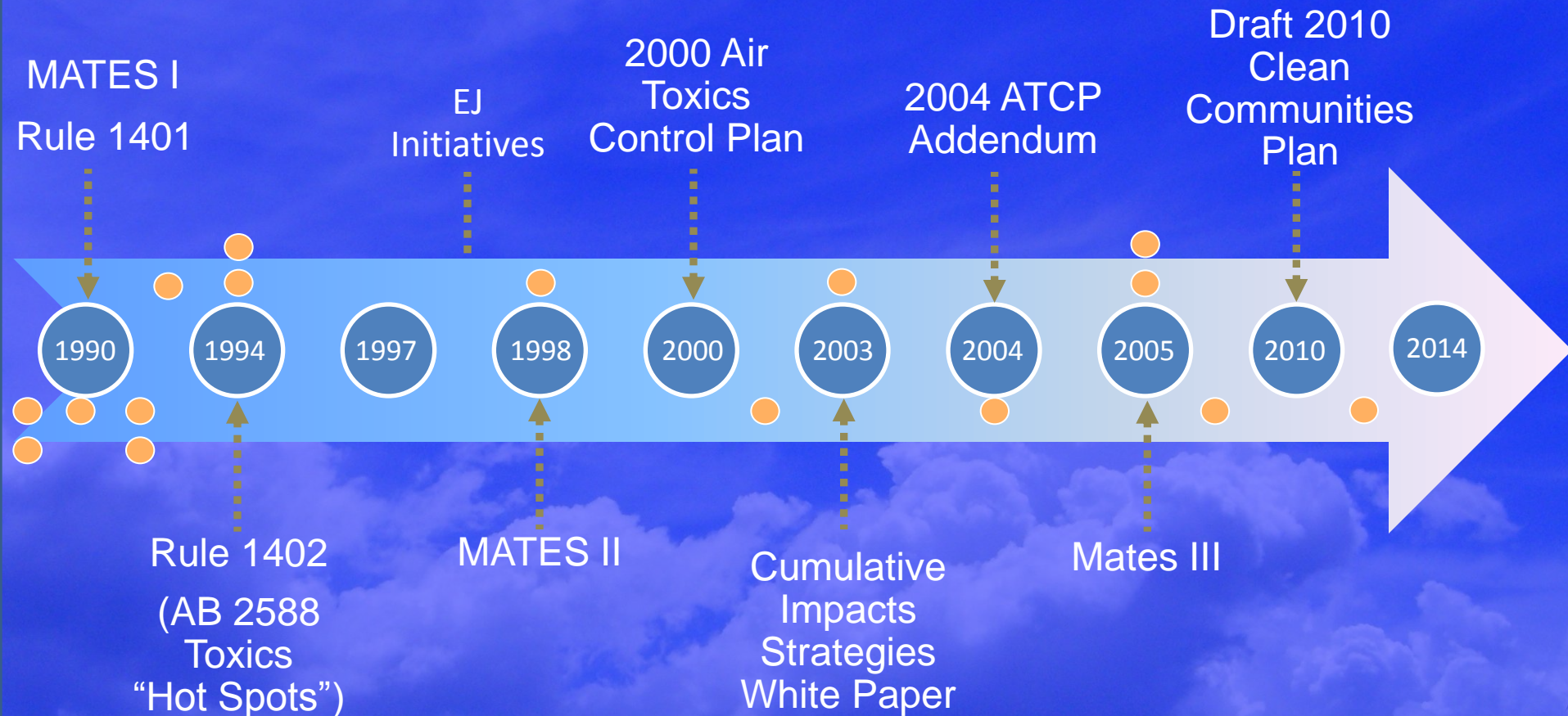
Worker Receptor  
Cancer Risk  
**(Slight Change)**

# “Umbrella Toxics Rules”



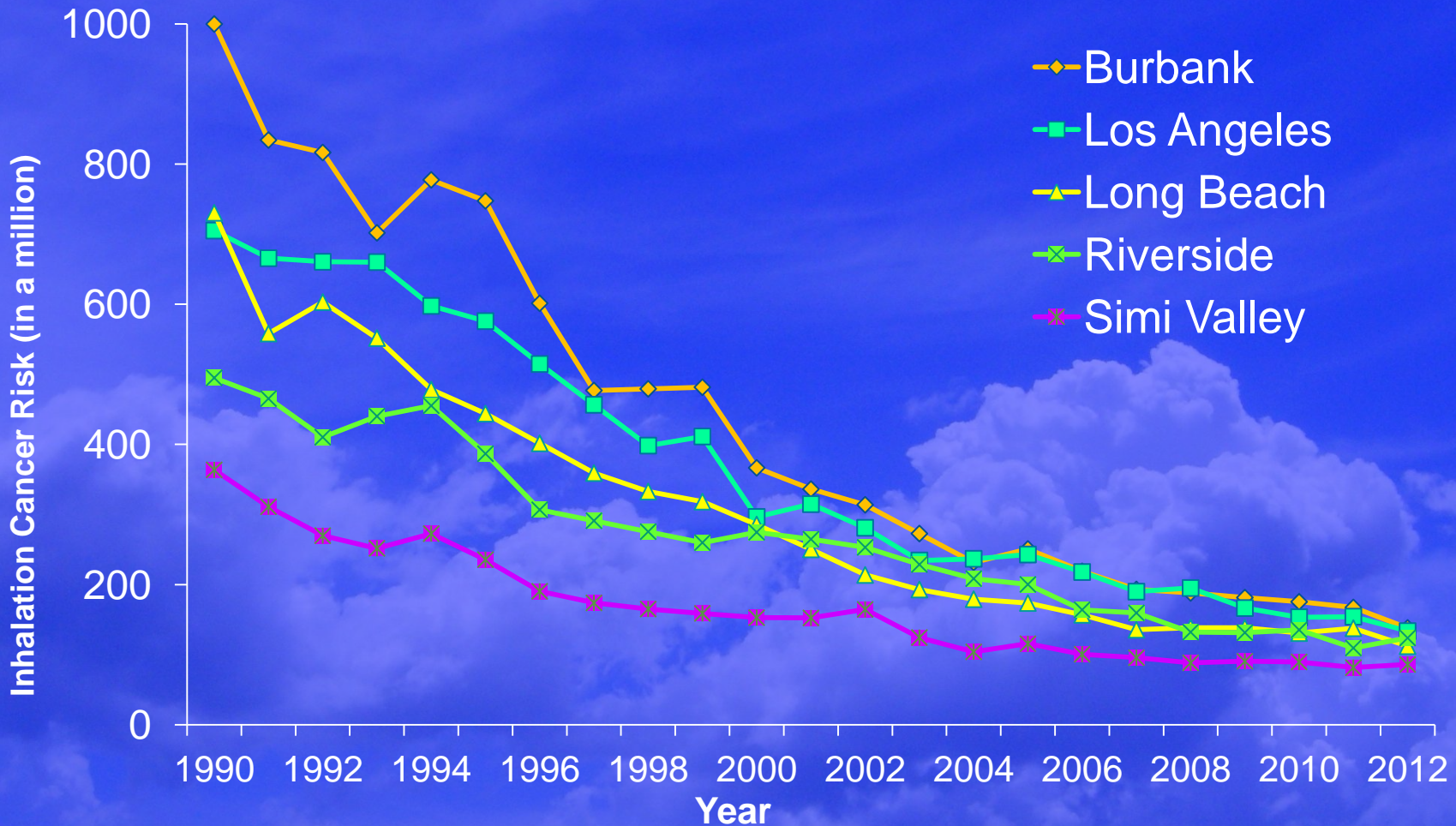
- Rule 1401 – Toxic requirements for new and modified permitted sources
- Rule 1401.1 – Toxic requirements for new and modified permitted sources near schools
- Rule 1402 – Toxic requirements for existing facilities
- Rule 212 – Noticing for new and modified permitted sources

# SCAQMD's Air Toxics Program



● Represents adoption of a stationary source-specific toxic rule

# Trends in Cancer Risks Since 1990 (Excludes diesel PM)



# Risk Assessment & Risk Management

**Risk  
Assessment**

**Risk  
Management**



# Process

**March  
2015**

- OEHHA Approves Revised Guidelines
- HARP 2\* to be Released to Public

**April  
2015**

CARB and CAPCOA Approve Risk Management Guidelines

**Air Districts  
Implement  
Guidelines**

\* Hot Spots Assessment Reporting Program 2 (HARP 2) will incorporate new air dispersion model AERMOD and the Revised OEHHA Guidelines.



# Affected Programs

## Permitting

- Rule 1401 – New and Modified Permitted Sources
- Rule 1401.1 – New and Relocated Facilities Near Schools

## AB2588

- AB2588 Core Facilities
- AB2588 Industry-Wide Facilities
- Rule 1402 – Control of Toxic Air Contaminants from Existing Sources

## Revised OEHHA Guidance

## Public Noticing

- Rule 212 – New or modified permits
- AB2588 Facilities

## CEQA

- Air Toxics Analysis for
  - Construction Phases
  - Operational Phases

# Near-Term Needs

Interim permitting provisions for specific source categories

- Amend Rule 1401
- Develop source-specific rules, if needed
- Update supporting materials

Address inconsistencies with Revised OEHHA Guidelines

- Amend Rule 1401 and 1401.1
- Amend Rule 1402
- Amend Rule 212

Implement AB2588 using Revised OEHHA Guidelines

- Amend Rule 1402
- Revise Prioritization Procedures
- Revise Public Notification Guidelines

Policy for CEQA Projects

- Develop guidance for CEQA Guidelines
- Implement SCAQMD Lead Agency Projects first

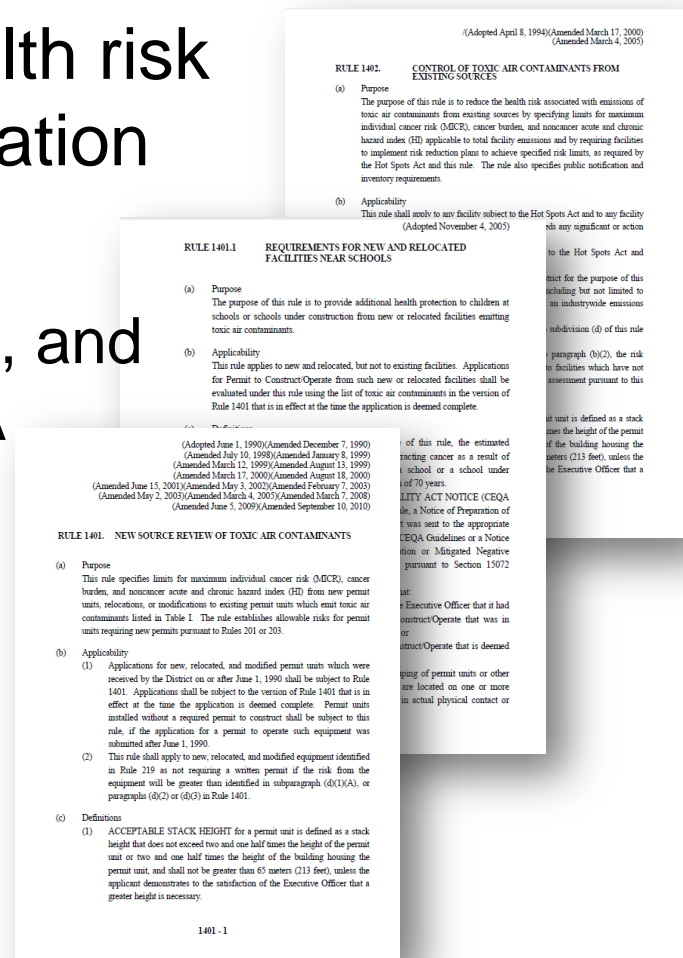
# Permitting

- Interim provisions may be needed for specific source categories that cannot meet Rule 1401 risk limits
- Recommendation:
  - Amend Rule 1401 to narrowly provide temporary relief from Revised OEHHA Guidelines for new and modified sources that cannot be permitted, if needed (No backsliding)  
*Schedule: May 2015*



# Rule Amendments to Address Inconsistencies

- Rules 1401, 1401.1, 1402, and 212 include references based on current health risk guidelines such as exposure duration
  - Recommendation:
    - Amend Rules 1401, 1401.1, 1402, and 212 to reference Revised OEHHA Guidelines
- Schedule: May 2015*



# AB2588

- Health risk assessments required under Toxics Hot Spots Program shall be prepared in accordance with Guidelines established by OEHHA (Health and Safety Code §(b)(2))
  - SCAQMD must use Revised OEHHA Guidelines for HRAs under the Hot Spots Program
- Recommendation:
  - All HRAs not yet approved will be required to use Revised OEHHA Guidelines

# AB2588 (*Continued*)

- Other action items to implement Revised OEHHA Guidelines:
    - Update Supplemental HRA Guidelines for AB2588
    - Revise Prioritization Procedures
    - Revise AB2588 Public Notification Procedures
- Schedule: May 2015*

# CEQA

- Revised OEHHA Guidelines will affect construction and operational phases, particularly diesel and mobile sources
- SCAQMD's CEQA Handbook references Rule 1401 for risk assessment methodology
- Recommendation:
  - Reference Revised OEHHA Guidelines
  - Develop recommendations for use of Revised OEHHA Guidelines for CEQA Projects (Risk management decisions –Governing Board)
  - Implement SCAQMD Lead agency projects first, then other lead agency projects
  - *Schedule: May 2015*



# Outreach and Communication

- CARB and CAPCOA to develop a statewide outreach and communication effort
- Messaging is important – Air toxic emissions have not increased, state has changed how air toxics risks are estimated
- Recommendation:
  - Initiate public workshops throughout the Basin in March
  - Conduct individual stakeholder meetings
  - Develop outreach and communication materials
  - Continue working with CARB and CAPCOA to develop a statewide outreach and communication effort



# General Timeline



OEHHHA Approve Revised Guidelines  
Public Release of HARP2



Approve Risk Management  
Guidelines

|             |             |             |             |             |             |             |             |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Mar<br>2015 | May<br>2015 | Aug<br>2015 | Oct<br>2015 | Jan<br>2016 | Apr<br>2016 | Aug<br>2016 | Oct<br>2016 |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|

**Outreach, Communication and Training**

**Permitting**

**CEQA**

**AB2588**

# Recommended Action

- Implement enhanced outreach and risk communication activities
- Proceed with development of adjustments to SCAQMD's various programs related to Risk Assessment
- Updates to the Stationary Source Committee during rule development process

