



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Jean Ospital, Dr. Ph
South Coast Air Quality Management District
21865 Copley Drive
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Dear Jean:

Comments on Draft MATES III Report

The Sanitation Districts of Los Angeles County appreciate this opportunity to comment on the SCAQMD's Draft MATES III Report. We commend the staff for the outstanding effort that went into preparing the report.

As an over-arching comment, we note that the ARB has commented on the building of schools within 1000 feet of a freeway (see: Air Quality and Land Use Handbook: A Community Health Perspective). State law also restricts the siting of new schools within 500 feet of a freeway, urban roadways with 100,000 vehicles/day, or rural roadways with 50,000 vehicles with some exceptions.¹ However, no such requirements apply to the siting of residences, day care centers, or medical facilities. Furthermore, school districts can still site new schools near freeways and other major sources if they demonstrate that overriding conditions exist. Given the conclusions of MATES III, SCAQMD should work with CARB to include additional guidance for the siting of facilities near freeways. This land-use guidance should now include the siting of other sensitive and residential receptors.

Our remaining comments aim to improve the report's clarity and usefulness for a wider audience:

- The Executive Summary does not include an introduction to the topic of risk for readers who are not among the inner circle of the MATES III Technical Advisory Group. Such an introduction could help the SCAQMD obtain feedback on where to focus their energies and in drawing wider support for those efforts. One such

¹ Section 17213 of the California Education Code and section 21151.8 of the California Public Resources Code.

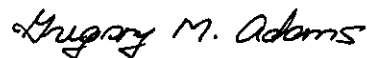
summary is the introduction for laypersons found in Dr. Thomas M. Mack's, "Cancers in the Urban Environment," page 3.

- The Report itself does very little to correct the misperception that ALL cancers derive from environmental airborne exposure. The Report does not explicitly mention that the analysis excludes many other contributors to total cancers such as smoking, etc. We recommend including some perspective on potential contributors to cancers in the population such as a simple pie-chart, at the beginning, showing likely origin of cancers, e.g., environmental exposure, occupation, diet, genetics, smoking, etc.
- The report does not discuss uncertainty in the analyses.
- The treatment of results below the method detection limit follows an EPA protocol, and not the more rigorous method offered by the SCAQMD's "Risk Assessment Procedures for Rules 1401 and 212, Version 7.0, July 1, 2005." Moreover, it is not clear if field blank analyses were subtracted from the average result or even if they were taken during the study. There is no justification given for the different treatment of metals from the other compounds tested. If metals are presumed to always be present, then the other compounds of interest should be as well, especially if SCAQMD has data confirming their atmospheric release in the SCAB. In other words, those "less than" results should not be reported as zeros.
- The location of the fixed monitoring sites is on average much closer to the freeways (0.79 miles) than the average neighborhood (2.89 miles) in the SCAB. A map of areas immediately bordering the freeways (see attached figure) shows that the vast majority of the SCAB's population are not in close proximity to a freeway. Consequently, it is clear that the results from the fixed monitoring sites are more influenced by freeway emissions than what the *average* resident in the SCAB experiences. This difference only complicates the final analysis and dilutes the impacts of the study's conclusions. Future studies should try to better reflect the *average* air that residents in the SCAB breathe.
- Emissions of EC PM_{2.5} reportedly derive mainly from on-road, Diesel powered vehicles. Nevertheless, exhaustive measurements taken at the fixed sites do not show a good correlation between distance from a freeway and ambient levels. As mentioned at the most recent Technical Advisory Group meeting, cold-starting gasoline engines are also significant contributors to this metric. The metric for assaying Diesel particulates still needs refinement.

- Cancer potency levels for Diesel particulates were developed largely from epidemiological studies of rail workers from the 1950's and 1960's. Since that time, there have been tremendous strides in both fuel reformulation and in emissions controls, most notably the imposition of vastly reduced sulfur content and reduced particulate emissions. These improvements are not reflected in today's Diesel cancer potency level. It is very likely that Diesel particulate size fractions have decreased relative to what was experienced in previous generations. The Report should address the potential impact of reformulated Diesel and emissions controls on reported cancer potency levels.
- The report should highlight the vast changes anticipated by implementation of CARB's ATCMs reducing Diesel risk in the State.

If you have any questions regarding this transmittal, please do not hesitate to contact Mr. Patrick Griffith at (562) 908-4288, extension 2117.

Very truly yours,
Stephen R. Maguin



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Technical Services Department

GMA:PG:bb
Enclosures

cc: Elaine Chang – SCAQMD
Tom Chico – SCAQMD

Freeway Buffer Zones and Residential Areas South Coast Air Basin

