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By Electronic Mail
and U.S. First Class Mail

South Coast Air Quality Management District
Attention: Dr. Jean Ospital
SCAQMD Health Effects Officer
21865 East Copley Drive
Diamond Bar, California 91765-4182

Re: Comments on MATES-III Draft Report (January 2008)

Dear Dr. Ospital:

This letter is submitted on behalf of the County of Orange ("County") in its capacity as the owner and operator of John Wayne Airport, Orange County ("JWA" or "Airport"), located in Costa Mesa, California. This letter contains the County's written comments on the *Multiple Air Toxics Exposure Study in the South Coast Air Basin* (January 2008 Draft) ("MATES-III Report" or "Report"), which evaluates the carcinogenic risk from exposure to air toxics throughout the South Coast Air Basin ("Basin") and was prepared by the South Coast Air Quality Management District ("SCAQMD" or "District"). The County appreciates the opportunity to provide comments, which follow below, on the MATES-III Report.

I. INTENDED USE OF THE MATES-III REPORT

As provided in the Report, there are several elements to this air toxics study: (i) a monitoring program; (ii) an updated emissions inventory of toxics air contaminants; and (iii) a modeling effort to characterize risk across the Basin. (MATES-III Report, p. ES-1.) However, the MATES-III Report does not thoroughly discuss how the Report will be integrated and relied upon in subsequent regulatory efforts by the District. In fact, the only discussion of the intended uses of this Report is contained in a single sentence: "The results of the effort can . . . be used to update and develop appropriate control strategies for reducing exposures to toxics associated with significant public health risks." (*Id.* at p. 1-2.)

Although our attendance at one of the community workshops confirmed that the District intends to use the MATES-III Report to update its Air Toxics Control Plan, this intended use should be more expressly addressed in the MATES-III Report. Only by expressly identifying the intended use(s) of the MATES-III Report can potentially interested individuals, organizations and agencies confirm whether it is appropriate or necessary to submit comments.

Relatedly, it is difficult to evaluate the Report without knowing the conclusions that the District will draw from the MATES-III Report, and how the District will apply those conclusions to support its update to the Air Toxics Control Plan.

II. ABSENCE OF CORRELATION BETWEEN SOURCE AND EMISSIONS

The MATES-III Report does not clearly tie particular toxic substances to the emitting source(s). Therefore, it may be difficult to rely upon this Report when updating the Air Toxics Control Plan. If the District is not able to tie the substances to sources, then there may be no sound technical basis upon which to impose regulatory parameters. That is, before imposing any regulations, the District should know what percentage of the emissions inventory for a particular toxic substance is attributable to each particular source, such that the burden of various emission reduction measures may be fairly apportioned and proportional to each discrete source's contribution of air toxics. For instance, the Report's results indicate that diesel exhaust is the "major contributor" to air toxics risk, accounting for approximately 84% of the total risk. (MATES-III Report, p. ES-3.) The diesel exhaust sources should be specifically identified in the Report, and each source's contribution to the 84% total risk determination should be identified. A similar inquiry should be undertaken for each air toxic substance and emitter.

III. METHODOLOGY EMPLOYED TO MONITOR AIR TOXICS

Many of the monitoring stations utilized were "temporary sites" and appear to have only been monitored for "periods of several months" and using "moveable monitoring platforms." (MATES-III Report, p. ES-1.) Prior to utilization of any of the data collected during the monitoring efforts to update and develop control strategies for reducing exposures to toxics, additional monitoring efforts must be undertaken for substantially longer periods of time to ensure that the data collected is accurate and appropriate for utilization in developing control strategies.

IV. CONCLUSIONS OF MATES-IIII REPORT

According to the Report, all source categories, but for off-road mobile sources, showed a decrease in air toxics emissions. (MATES-III Report, p. 3-10.) The Report should be revised to provide an analysis of the one percent increase for off-road mobile sources in light of the fact that all other sources were subject to substantial decrease -- on-road mobile sources decreased by 13%; point sources decreased by 65%; and area sources decreased by 43%.

In closing, we thank you again for the opportunity to submit comments on the MATES-III Report. Please do not hesitate to contact me with any questions or concerns that arise during your review of this letter.

Very truly yours,

Lori D. Ballance
of
Gatzke Dillon & Ballance LLP

LDB/rlf

cc: Alan Murphy, Airport Director, John Wayne Airport