From: Raul Sobero [RSobero@ph.lacounty.gov]
Sent: Monday, October 01, 2018 11:46 AM
To: Susan Nakamura
Cc: Jillian Wong; Daniel Garcia; Cristina Lopez; Cyrus Rangan; Katie Butler; Christine Montes
Subject: LACDPH/TEA Branch Input for Proposed Rule 1480

Good Morning Susan:

Enclosed please find our initial input for Proposed Rule 1480.

We included recommendations for the dissemination of test results to the community as well as community considerations.

Thank you again for the opportunity and please let me know if you have any questions.

Best regards,

Raúl

Raúl Sobero, Dr.PH, MPH Health Program Analyst III, Community Risk Reduction Toxicology and Environmental Assessment Branch Los Angeles County Department of Public Health 695 S. Vermont Ave, South Tower, 14th Floor Los Angeles, CA 90005 Direct: (213) 738-2184 Main: (213) 738-3220

SCAQMD Proposed Rule 1480 - Toxic Metals Monitoring Initial Input from the Department of Public Health Toxicology and Environmental Assessment Branch – October 1, 2018

Recommendations for Disseminating Test Results to the Community

- Multilingual website(s) that includes easy to read information on contaminants being tested, health risks, health risk thresholds, and results.
- Persons accessing the website(s) should have the ability to query test results by location to easily create frequency tables and maps.
- Data for at least the past 6 months should be available on the website(s) with a straightforward process for requesting data older than 6 months.
- The website(s) should be available on mobile platforms (e.g. tablets, cell phones, etc.).
- Outreach for the website(s) should be conducted via television, radio and newspapers in English and other predominant languages.

Community Considerations

- Many community members will not trust data that is generated and reported by operators. Every effort to ensure transparency in the process as well as the accuracy and integrity of the data must be made to address community concerns.
- Technical guidelines must be given to set a minimum detection level and other operational specifications of the monitoring systems. This should include guidelines for ensuring that equipment is operational during any type of weather or other conditions typical to the sites operations and location. There should be enforcement related to the reliability of the monitoring system and penalties for a system that is offline more than rarely. Detection levels should be set to address community concerns such that results can be compared to appropriate health standards for sensitive populations (e.g. detection levels must be lower than residential air screening levels as promulgated by Cal/EPA and USEPA).