



South Coast Air Quality Management District

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Transmitted via E-mail [whunter01@aol.com; taskforce@dpw.lacounty.gov] and U.S. Mail

May 1, 2023

Mr. Wayde Hunter, Chair
Sunshine Canyon Landfill Community Advisory Committee
16911 San Fernando Mission Blvd., Box 412
Granada Hills, CA 91344

Ms. Margaret Clark
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

Re: Response to Health Risk Assessment prepared by ECORP Consulting, Inc. for the SCL-CAC

Dear Mr. Hunter and Ms. Clark:

Your letters of January 16, 2023 and April 13, 2023, sent to the South Coast Air Quality Management District (South Coast AQMD) on behalf of the Sunshine Canyon Landfill Community Advisory Committee (SCL-CAC), and Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) highlights the Health Risk Assessment (HRA) prepared by ECORP Consulting, Inc. for the SCL-CAC, dated September 2022, which shows elevated carcinogenic risk from on-road and off-road diesel mobile sources. As such, you indicate that additional emission control strategies are warranted under the regulatory oversight under South Coast AQMD Rule 1402 and AB 2588 Air Toxics "Hot Spots" Program. We believe it is important to clarify how the program is conducted and limitations to the implementation.

AB 2588 Air Toxics "Hot Spots" Program

AB 2588 requires the South Coast AQMD to designate high, intermediate, and low priority categories and place each facility within the appropriate category based on its individual total facility priority score. In order to prioritize the facilities, facilities subject to AB 2588 are required to submit a detailed list of their toxic emissions every four years (referred to as a quadrennial update). These toxic emissions are generated by stationary sources from the operation of a permitted facility.

The program does not include mobile sources. South Coast AQMD staff then uses the current prioritization procedures to designate the facilities based on their total facility priority score. Based on the total facility priority score, facilities designated as high priority (scores greater than 10) are required to

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submit an Air Toxics Inventory Report (ATIR) and potentially an HRA if the ATIR still indicates a priority score greater than 10. This designation could also lead to additional control strategies to reduce risk if results of the HRA trigger risk reduction thresholds under Rule 1402 and/or AB 2588. Facilities ranked with intermediate priority (scores between 1 and 10) are considered to be District Tracking facilities, which are required to submit a complete toxics inventory once every four years. Facilities ranked with low priority (scores less than 1) are exempt from reporting.

SCL's most recent quadrennial reporting year was in 2018 and based on their 2018 emissions inventory, South Coast AQMD staff calculated a total facility priority score of 6.80, which places the facility in the Intermediate Priority category. Therefore, SCL does not need to prepare an ATIR or HRA pursuant to South Coast AQMD Rule 1402; accordingly, additional control measures under the AB 2588 program do not need to be imposed at this time. South Coast AQMD staff will calculate their priority score using the 2022 emissions inventory, which is the next quadrennial reporting year for the facility.

More information on the AB 2588 program can be found here:

<http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588>

More information on the SCAQMD's prioritization procedures can be found here:

<http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588/prioritization>

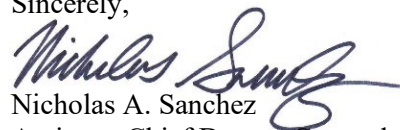
At SCL, monitoring data provides a comprehensive overview of the levels of air toxics in the community because the monitors are capable of capturing air toxics from all sources, including those at SCL as well as other nearby emission sources, such as mobile source emissions.

As you know, an HRA is a study that uses computer modeling to estimate potential toxic health risks in a community from a facility's emissions and assesses if an air quality concern exceeds SCAQMD thresholds. HRAs are also typically conducted when a project is subject to the California Environmental Quality Act (CEQA) whereby all sources of stationary, mobile, area (unpermitted), and toxic emissions being generated as a result of the project are evaluated. SCL is currently proposing facility modifications which are subject to such an evaluation for which a Subsequent Environmental Impact Report, including an HRA, is being prepared. These documents will be available for public review and comment, upon their release.

More information regarding the SCL project can be found in *Attachment C* (last page) of our monthly Board item regarding Lead Agency projects:

<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2023/2023-apr7-015.pdf>.

Sincerely,



Nicholas A. Sanchez
Assistant Chief Deputy Counsel