

# Update on Risk Management

Briefing for Stationary Source  
Committee  
January 23, 2015

# Background

- Office of Environmental Health Hazard Assessment (OEHHA) responsible for **Risk Assessment** guidance
  - Risk factors for chemicals
  - Assumptions on breathing rates, exposure duration, multi-pathway exposures, etc.
- **Risk Management** is responsibility of air districts and others
  - Decisions for permits, rules, other programs
- Revised Risk Assessment guidelines expected to be released Feb/March 2015
- Risk Management guidelines need to be updated

# Risk Assessment Changes

- Updated scientific information
  - New studies on childhood sensitivity
  - New data on exposure (e.g. breathing rate and time at home)
- Impacts of the updates
  - Cancer risk estimates for residential exposures will increase ~2.5 - 3 times, even though emissions have not changed
  - Potential to impact facilities (and agency workload) for permitting, Toxic Hot Spots (AB2588), rules, CEQA, other programs

# Example of Potential Implications

- Permitting - some equipment that could get a permit today may not be able to get a permit or may have to:
  - Add controls
  - Change process or products used
  - Do more extensive modeling
  - Reduce throughput
- AB2588
  - More facilities will have to do public notice and/or Risk Reduction Plans

# History

- Previous Risk Management Guidelines developed jointly with CARB/CAPCOA in 1993
  - SCAQMD and Bay Area already had developed toxic programs
- Old Guidelines cover permitting only
  - Provide suggested ranges to assist districts in setting their rules and policies
  - Not mandatory

# Current Efforts

- Joint effort of CAPCOA and CARB
- Revised guidelines for permitting; will include AB2588
- Document to include:
  - Discussion of progress in reducing emissions and risk
  - Changes to Risk Assessment methods
  - Outline what other activities will be taken to further reduce emissions

# Objectives

- Based on CAPCOA and CARB principles
- Increase public health protection
  - More sources will install Best Available Control Technology for Toxics (TBACT)
  - Pursue further opportunities to reduce risk from the highest risk source categories, considering technical feasibility and cost
- Air districts have mature programs and have discretion to establish own risk management policies, except when state rule sets a floor

# Objectives, con't.

- Need to sustain continued operation of essential goods and public services, while ensuring no backsliding compared to pollution levels allowed under existing programs
- Support public participation and access to information



# Public Process

- CAPCOA and CARB developed criteria and draft concepts
- Two Stakeholder working groups so far; additional meeting planned
- Public workshops to be held in northern and southern California
- CARB Board consideration in March

# Draft Concepts

- Permitting
- AB2588
  - Prioritization
  - Public notification
  - Risk Reduction Plan
- Breathing Rates

# Permitting

- District sets permitting level(s)
- Approve if below level; recommend:
  - TBACT if  $> 1$  in a million
  - 10 – 25 in a million
  - Hazard Index (HI)  $\leq 1$
- Deny if above level, with some exceptions for special cases

# AB2588

- Prioritization (rank facilities to see if an inventory and/or risk assessment is needed)
  - CAPCOA has developed factor to reflect new methodology
  - Included in new software
- Public notification
  - Districts establish level(s) and procedures for public notification
  - Possible to have different requirements for different types of sources or risk levels

# AB2588, con't.

- Risk Reduction Plan
  - Districts may or may not adjust the level for requiring this plan
  - Recommend trigger level not exceed 100 in a million and HI of 10.

# Breathing Rates

- Previously, all ages assumed to breathe at the same rate
- New guidance distinguishes by age brackets
- Recommend use combination of 95<sup>th</sup> and 80<sup>th</sup> percentile breathing rates
  - 95<sup>th</sup> percentile for last trimester through age 2
  - 80<sup>th</sup> percentile for other age groups

# Scope of Future Efforts

- Risk communication documents and fact sheets being developed
- Technical work (computer models, prioritization procedures, TBACT update) being updated
- CARB Board to consider Risk Management Guidelines at April Board meeting
- CARB staff will outline future steps to review their toxic rules
- Joint work on industry-wide and other guidance documents that rely on risk
- CARB to evaluate and update Fee Rule, Emissions Inventory Guidance, and Land Use Handbook

# SCAQMD Efforts

- Participating actively in CAPCOA/CARB work
- Developing work plan to outline potential changes to SCAQMD rules and programs
- Will bring work plan to Governing Board in March 2015