SCAQMD Toxic Rules Program and Health Effects Policy

Assessing and Managing Toxic Risk from Alternative VOC Compounds Symposium

October 29, 2014

SCAQMD and Public Health

- Agency priority is public health protection
- Support use of best available science
- Health assessments consistent with Guidelines established by California Office of Environmental Health Hazard Assessment (OEHHA)
- Sensitivity to economic impacts of regulations

Example Toxics Regulations

- Rule 1401: New Source Review of Toxic Air Contaminants
- Rule 1401.1: Requirements for New and Relocated Facilities Near Schools
- Rule 1402: Control of Toxic Air Contaminants from Existing Sources
- Focus is on potential for community exposures

Example Community Risk Limits

- Existing Facilities– Rule 1402
  - Risks above action levels requires risk reduction
    - Cancer risk above 25 per million; cancer burden above 0.5; Hazard Index above 3
  - Public notification requirement
    - Cancer risk above 10 per million; Hazard Index above 1 (0.5 for lead)
- New, modified, or relocated permit units – Rule 1401
  - Limits cancer risk to 1 per million (10 per million with T-BACT); cancer burden limit at 0.5
  - Limits Hazard Index to 1
  - Cancer risk limit 1 per million near schools (Rule 1401.1)

Occupational Exposures

- Regulatory authority for exposure limits resides with Occupational Safety and Health Administration
- Historical deference to OSHA standards
- Recent concerns expressed regarding potential increases in occupational exposures with newly exempted substances
- Information to assess potential exposures and risks may be limited

OSHA Exposure Limit Issues

- OSHA Permissible Exposure Limits intended to protect workers against hazardous substances
  - OSHA PELs cover < 500 Chemicals
  - Most not updated in over 40 years
- "Many of our chemical exposure standards are dangerously out of date and do not adequately protect workers“
  - Assistant Secretary of Labor for Occupational Safety (October, 2014)
- CalOSHA lists 680 values for substances
- PELs allow for higher risks than SCAQMD rules
- How should SCAQMD consider potential for worker exposure?