Community Emission Reduction Plan (CERP) Comment Form

Language Preference
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AB617 Community
South Los Angeles

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Form Informtion

Date Created	Time Created
03/17/2022	10:01 PM

Commentor Contact Information

Commenter's Name	Affiliation
ELIZABETH KAMAI	Agency, School, University or Hospital

Comments (Unlimted Size)

My name is Elizabeth Kamai. I am a Los Angeles resident (just a couple of blocks west of the South LA Community Boundary), environmental epidemiologist, and Postdoctoral Research Associate in the Division of Environmental Health at the Keck School of Medicine at the University of Southern California.

I have three primary areas of concern.

First is the assessment of baseline emissions in Chapter 3B:

It is unclear whether this emissions inventory included any measurements of air pollutants, or if it relies entirely on model estimates and self-reported data from large industries.

What does it mean that "it includes an emphasis on identifying sources within the community"? (page 3b-1).

Visualization of this chapter would be beneficial.
Page 3b-2: "There are areas within SLA community with significantly higher air toxics cancer risks compared to the average of the Basin." A map of air toxics measures or estimates and of air toxics cancer risks in SLA would clarify this statement.

Page 3b-2: "The community also includes a wide range of industrial facilities, including those that conduct metal processing, surface coatings, auto body shops, and warehousing that attracts heavy-duty truck traffic." Where are these industrial facilities located? What proportion of these facilities report emissions estimates to the AER?

Page 3b-2: "In this community, onroad mobile sources are the largest emitters of NOx, with heavy-duty trucks being the largest contributor." Clarify how this was determined.

Again, a map and additional graphics would be helpful in this section. Where are the mobile, area, and point sources of emissions concentrated, per this emissions assessment? Do the "hot spots" identified by this emissions attribution assessment align with the lived experience of community members?

What does "solvent evaporation" mean and where is it occurring? Are there specific industries or locations that produce this source of VOCs?

Where do emissions from oil and gas operations fit in to this assessment?

"[T]he chemical and plastics industry" is mentioned several times, but it is unclear what this entails. Where are these facilities? Do they report to AER?

The Annual Emissions Reporting program is an extremely limited assessment of air toxics emissions in SLA. The limitations of these data - that they are self-reported by facilities, do not include measurements, and reflect only about a dozen facilities in the entire SLA community -need to be emphasized, and the vast missingness of air toxics data needs to be evaluated and estimated to include in this baseline emissions estimate. It is misleading to write that "all" sources are included in this emissions assessment (e.g., in the title of Figure 3b-7) because the AER includes only a handful of the largest facilities in SLA. Only a couple of the more than 40 electroplating facilities in SLA (potential sources of hexavalent chromium) are required to report to the AER. None of the metal recycling facilities (potential sources of lead, arsenic, mercury, and other toxics) report to the AER. None of the autobody shops report to the AER.

and other toxics) report to the AER. None of the autobody shops report to the AER.

Finally, this chapter in general is difficult to read. Consider re-organizing it in a more narrative style.

My second concern is the emissions estimates presented in Chapter 5a. Where are the other air toxics emissions? How will they be reduced by the CERP?

My final main concern is the lack of emissions reductions activities Chapter 5 of this emissions reduction plan.

None of the metrics include estimates, let alone measures, of associated emissions and how the actions would result in emissions reductions. Emissions estimates are necessary to evaluate whether this emissions reduction plan actually results in emissions reductions.

It would be helpful, as community members have suggested, to include an indicator of what level within the Hierarchy of Controls at which each emissions reduction "action" belongs.

Community air pollution exposure is intricately linked to workers' occupational air pollution exposure. I would like to see collaboration with OSHA or other workplace safety organizations to work to implement emissions reductions best practices in tandem with occupational safety best practices.

Chapter 5b: Mobile Sources
Explain how each metric relates to emissions reductions. Ex: How does the number of outreach events in the community result in emissions reductions and of which pollutants?

Goal B is listed as, "Reduce students' exposure to air pollution, especially mobile source emissions at schools." However in Table 5b-1, it has been changed to "School Air Filtration." These are different goals. Installing air filters in schools will reduce children's exposure to air pollution in their classrooms, but not at recess, not a lunch, not between classes, not before school, not after school, not walking to school, not participating in after school activities. Rather, to meaningfully reduce children's exposure to air pollution from mobile source emissions at schools, trucks should be routed away from schools, trucks and cars should be electrified (which would also require supporting installing electric vehicle charging stations throughout the community), idling sweeps should be conducted near schools, and no idling zones must be enforced.

Chapter 5c: Auto Body Shops
Explain how each metric relates to emissions reductions. Ex: How does the Number of updates from appropriate agencies regarding referrals or follow-up information to the CSC result in emissions reductions and of which pollutants?

Chapter 5d: General Industrial Facilities
Explain how each metric relates to emissions reductions. Ex: How does providing emissions data for identified facilities result in emissions reductions and of which pollutants?

How will facilities be prioritized? Will air pollution measures be taken at these facilities?

Consider broadening the requirements of AER to include smaller facilities. Additionally, consider using cumulative impact assessments in permitting and regulating existing facilities so that clusters of many small, relatively low emissions facilities do not result in hot spots of highly toxic air pollution.

The F.I.N.D. tool is not user friendly and difficult to use. Rather than encouraging and teaching community members to use this tool, consider investing in creating better tools. Link to other agencies' data and maps, enable creation of your own maps and easy downloading of data, and proactively improve the tool to fit community members' needs.

Chapter 5e: Metal Processing Facilities
Explain how each metric relates to emissions reductions. Ex: How does conducting a workshop result in emissions reductions and of which pollutants?

Consider broadening the requirements of AER to include smaller facilities. Additionally, consider using cumulative impact assessments in permitting and regulating existing facilities so that clusters of many small, relatively low emissions facilities do not result in hot spots of highly toxic air pollution.

Chapter 5f: Oil and Gas Industry
Explain how each metric relates to emissions reductions. Ex: How does the number of working group meetings result in emissions reductions and of which pollutants?

Change "explore expanding Rule 1148.a and 1148.2" to "enforce Rule 1148.a and 1148.2 to the fullest extent of the law"

Overall, this report lacks a clear connection between the emissions estimated in Chapter 3 and the proposed reduction activities in Chapter 5. It would be helpful to include maps of current air pollution hot spots and sources and point to where and how each action in the CERP will result in reductions in air pollution.

Upload Additional Comment and Supporting Files (30 Mb Maximum per file)

CERP Comment Files

Note: Supported upload files include all versions of Microsoft Office, jpeg, tiff, PDF, mp3, mp4, and text files.
For More Information Contact: ab617@aqmd.gov