New California Air Toxic Emissions Requirements

With the advent of AB 617 the California Air Resources Board (CARB) and local air districts are focused on identifying, reporting and reducing health risks throughout California. Perhaps the most significant element of this effort is the proposed update to the AB 2588 Air Toxic “Hot Spots” Program. Recently CARB in coordination with OEHHA identified a list of over 800 compounds for potential inclusion into the AB 2588 program. Many of these compounds do not have test methods or toxicity factors, so it is unclear how such a proposal will be implemented. What we do know is that these programs will increase the calculated cancer risk from wastewater treatment plants and many other facilities.

Background: AB 617 - Community Focused Air Pollution Reduction Program

AB 617 expands CARB’s regulatory authority over stationary sources and requires the preparation of a statewide strategy to reduce emissions of toxic air contaminants and criteria pollutants in communities affected by a high cumulative exposure burden. This legislation further requires CARB to update the state-wide strategy at least once every five years and to consult with environmental justice organizations.

CARB’s Criteria Pollutant and Toxics Emissions Reporting Program

As proposed, this new reporting program will greatly expand the number of toxic compounds that must be reported and posted on CARB’s Pollution Mapping Tool website. While testing is not required, reporting of toxic emissions for up to 800 new toxic compounds could be required. The net effect:

- The list of reportable compounds could be expanded drastically.
- Concentrations of reported toxic compounds can be greatly exaggerated without real test data.
- Reporting of exaggerated toxic emissions is likely to trigger the preparation of complex and expensive cancer risk assessments and the resulting cancer risk would be reported to surrounding communities.

What is an Acceptable Cancer Risk for Neighborhoods Surrounding your Facilities?

What is the Impact of Notifying the Public of an Exaggerated Cancer Risk?

Would your Agency Install Costly Treatment Systems to Reduce the Cancer Risk?