



## Foundry/Corporate Office

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**Date: January 22, 2013**

CalEnviroScreen  
c/o John Faust Chief, Community Assessment & Research Section  
Office of Environmental Health Hazard Assessment  
1515 Clay Street, Suite 1600  
Oakland, CA 94612

**Sent via Email:** CalEnviroScreen@oehha.ca.gov

### **RE: Oppose Using CalEnviroScreen for Permitting or Enforcement**

AB&I Foundry was established in 1906. We have continuously operated in the City of Oakland for over 100 years. We currently employ 300 employees, providing high-paying manufacturing wages, as well as health care coverage. AB&I manufactures pipe and fittings for the commercial plumbing industry as well as custom castings that are used in a myriad of other industries including the agriculture, machine tool, and medical device industries. All of AB&I's production utilizes recycled metals that would otherwise go to landfill. We compete around the world.

As a small California business, we are trying to remain competitive and keep our workers employed in an unpredictable economy. We are very concerned that CalEnviroScreen is a model that can be misused and add uncertainty to very difficult economic times.

The most recent model implies that environmental effects indicators (e.g. solid waste sites) in the pollution burden category correlate with exposure. We disagree with this assumption. Moreover, the model does not distinguish between health outcomes driven by socio economic status and those caused by chemical pollution exposure. Finally, population characteristics do not have the same root cause as pollution exposures. Multiplying the two issues confuses what will be the most appropriate and efficient solution for each problem.

Going forward, OEHHA should revisit the methodologies within the model. In addition, OEHHA must revise the draft guidance letter on the screening tool to more clearly specify appropriate and inappropriate uses of the tool. The tool can be used to satisfy the needs of SB 535, but should be explicitly unconnected from permitting, enforcement, regulatory guidance or rulemaking. The science is not clear enough to rely on the model for these latter issues.

Thank you for the opportunity to comment on this issue. I look forward to seeing a balanced model that achieves rational and reasonable goals for California.

Sincerely,

Kurt Winter  
EVP AB&I Foundry