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January 22, 2013

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

RE: Oppose Using CalEnviroScreen for Permitting or Enforcement

Certified Alloy Products Inc. was established in 1964 and currently operates in the city of Long Beach. We currently employ 98 employees; providing high-paying manufacturing wages, as well as health care coverage. We manufacture superalloys using recycled metals that would otherwise go to landfill or a scrap dealer. Our company serves the aerospace, automotive and industrial gas turbine markets and we compete around the world.

As a small California business, we are trying to remain competitive in very specialized markets 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 In addition, OEHHA must revise the draft guidance letter on the screening tool to more clearly specify appropriate and inappropriate uses of the tool.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,

James Bonny
EHS Manager