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01-22-13

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

Research Tool & Die Works Inc. was established in 1952 and currently operates in the city of Carson. We currently employ 54 employees, provide high-paying manufacturing wages, as well as health care coverage. We manufacture marine electrical hardware using recycled metals that would otherwise go to landfill. Our company serves the marine market and 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 In addition, OEHHA must revise the draft guidance letter on the screening tool to more clearly specify appropriate and inappropriate uses of the tool.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,

Kevin Perrault

Vice President of Manufacturing

Research Tool & Die Works, Inc.