



California Council for Environmental and Economic Balance

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July 29, 2026

Electronic submittal: OEHHHA Comment Portal: [Comment Submissions - Inhalation Unit Risk Factor \(IUR\) for Acrolein - OEHHHA](#)

And

OEHHHA Comment Portal: [Comment Submissions - Inhalation Unit Risk Factor \(IUR\) for Ethylene Oxide - OEHHHA](#)

Re: Comments from the California Council for Environmental and Economic Balance regarding OEHHHA's draft Inhalation Unit Risk Factors for Acrolein and Ethylene Oxide

Dear Dr. Woods,

The California Council for Environmental and Economic Balance ("CCEEB") appreciates the additional opportunity to provide comments to the Office of Environmental Health Hazard Assessment's ("OEHHHA") draft Cancer Inhalation Unit Risk Factors ("IUR") for acrolein and ethylene oxide ("EO"). CCEEB is a coalition of business, labor, and public leaders that work together to advance strategies to achieve a sound economy and a healthy environment. Founded in 1973, CCEEB is a non-profit and non-partisan organization that strives to provide pragmatic pathways - balancing the need to reduce emissions while keeping businesses competitive in California.

Regulations and controls based on OEHHHA's proposed IURs will have a significant impact on all industries operating in California, including all of our members, given that the preliminary cancer risk estimates cited by agencies for exposure to ambient acrolein and EO (1,300 in one million and 980 in one million respectively) taken together would in many areas of the state be more than all other pollutants and sources combined, and would represent an unprecedented health threat that would demand immediate actions by CARB and local air districts to mitigate the presumed cancer risks.

CCEEB is very concerned that OEHHHA and CARB are forging ahead to adopt final IURs and regulations even though others have pointed out significant concerns with the science and data, or lack of science and data, to support OEHHHA's findings. In summary, OEHHHA and CARB are moving forward even though:

- the IURs are not supported by human studies, and extrapolations are made from very few animal studies;
- exposure assessments are based on extremely limited mobile monitoring data that CARB acknowledges cannot support regulatory action;

- there is very little monitoring data to support OEHHA's and CARB's assessments; and
- “[t]here is currently no CARB-approved test method for acrolein from stationary sources.” (<https://ww2.arb.ca.gov/acrolein-test-method-advisory-and-data>. OEHHA/CARB should suspend any planned rulemaking activities until such time as an acrolein test method for stationary sources is developed and implemented.

These, and many other criticisms of OEHHA's proposed IURs, lead CCEEB and others to question whether the proposed IURs are accurate. OEHHA and CARB must clearly acknowledge these uncertainties and state that the data is not ready to support regulatory action.

OEHHA and CARB must also acknowledge new IURs and corresponding regulations will significantly expand CARB's and local air district's Toxic Air Contaminant Identification and Control Program and the Air Toxics Hot Spots Programs. In addition, districts will need to incorporate evaluation of cancer risks into their air toxics new source review programs and, in certain air districts, evaluation of health risk assessments. The impact is that many new sources will be incorporated into these programs, and the sources that are already in these programs will face impossible control requirements. Even public services such as water treatment, sanitation systems, and power generators will face unprecedented pressures to control emissions to levels that are not affordable or even possible. All of these changes will be based on unsupported and questionable IURs.

CCEEB asks that OEHHA and CARB take the time to get this right. OEHHA must acknowledge that far more work is needed before it can be confident of the IURs for acrolein and EO. CARB must state that it will not move ahead with controls and regulations until the data is ready, and that this will take time.

It is irresponsible for the state to adopt new IURs based on limited, flawed, or otherwise inadequate scientific evidence. The state should not rationalize adopting an unsupported standard with the idea that it can revise that standard in the future. It is important to note that it is very rare for CARB or OEHHA to re-assess standards once they are established. As an example, neither OEHHA nor CARB are considering revisiting the URF for diesel particulate matter even though a significant percentage of diesel fuel burned in California is renewable diesel (a fuel that was never assessed when the DPM URF was established).

Finally, OEHHA's recent process related to these two compounds has been sub-par and inadequate. There has been very limited stakeholder outreach. OEHHA proposed new IURs for acrolein and EO without any indication that they were planning to do so or engaging with stakeholders before the proposals were released for comment. OEHHA also did something similar with the recent update to CalEnviroScreen 5.0 where it worked with a select group of community representatives in private and then released proposed revisions to the general public without any advanced notification or public outreach. CCEEB requests that OEHHA provide much more information to all affected stakeholders, including industry, and hold public workshops before it issues proposed changes.

For all of the reasons listed above, CCEEB asks that OEHHA and CARB not move forward with the proposed IURs and subsequent regulations. OEHHA should work closely with the broader

scientific community, and CARB Scientific Technical Review Panel and issue updated IURs and Technical Support Documents.

CCEEB appreciates the opportunity to provide comment and looks forward to continuing to work with staff.

Sincerely,

A handwritten signature in black ink that reads "Tim Carmichael". The signature is fluid and cursive, with the first name "Tim" and last name "Carmichael" clearly legible.

Tim Carmichael
President and CEO
California Council for Environmental and Economic Balance (CCEEB)