

July 29, 2016

Dr. Kris Thayer, Director

Office of Environmental Health Hazard Assessment

1001 I Street

Sacramento, CA 95814

RE: Comments on the proposed changes to the IUR for Acrolein and Ethylene Oxide

Dear Dr. Thayer,

Thank you for providing us the opportunity to comment on the new proposed inhalation unit risk factors for both Ethylene Oxide and Acrolein. The last time the Office of Environmental Health Hazard Assessment made changes to the toxic air contaminant (TAC) list was when it added diesel emissions as a TAC in August 1999. Frontline environmental justice communities have been asking for the state to update its regulation of toxic air contaminants for decades and we applaud these current efforts.

Many environmental justice groups in California have been part of efforts to reduce the emissions of carcinogenic toxic air contaminants in our state now for many decades. Since the 1980s many of the environmental justice groups that now exist were formed specifically around the lived experience in communities experiencing excess morbidity and mortality from cancer. From

v the cancer clusters in McFarland, Earlimart and Rosamond in the mid 1980s,

v the toxic exposures from the Stringfellow Acid pits from 1979 to 1983,

v to the cluster of children born with retinoblastoma next to the Santa Susana Field lab in the early 2000s,

v to children affected by lead poisoning from the Exide Lead Smelter in East LA,

v the children that died from leukemia who all lived on the same street in Sacramento and drank TCE-contaminated water,

v to the Aliso Canyon release a decade ago where 12,000 were people evacuated and where first responders subsequently contracted cancer,

v to the cancers in children near oil and gas wells in South Central LA,

v to children with leukemia in Maywood who lived near its sterilizer,

v to the spiraling cancer rates in the communities affected by the Chiqita Canyon landfill fire happening now,

v And finally, to the Boyle Heights community being poisoned from the chemical disaster, fire, and rotting waste at the Lineage Warehouse today.

Cancer incidence and the public health impacts of pollution in highly polluted communities have driven the creation of the environmental justice movement in California. Many of the leaders and founding members of today's organizations can voice with grim detail their lived experience knowing that something was wrong in their community, but state agencies could never tell them what was causing their children and community members to die. These leaders and group members long suspected that some of the chemicals we currently regulate were not being effectively regulated due to a lack of understanding on the true carcinogenicity of these chemicals.

It is with this lived experience that we write to you today to support the state's actions to strengthen the Inhalation Unit Risk (IUR) standards for Acrolein and Ethylene Oxide. Both these chemicals are being emitted into hundreds of California communities today in every

area of the state. The IUR derived by the Integrated Risk Information System was created after a comprehensive analysis of data gathered by the National Institute for Occupational Science and Health (NIOSH) from more than 18,000 EtO-exposed workers across the country. The IUR incorporates both lymphoid cancers and breast cancers observed in the NIOSH cohort. The study is now over 2 decades old.

Acrolein is also being used as a biocide to prevent fouling in the oil and gas infrastructure across the state and is also emitted as a combustion byproduct from many sources of combustion across California including at landfills, mobile sources including diesel engines, jet engines, power plants, industrial incinerators, and in the course of both structural fires and wildfires.

We will place extensive supporting scientific evidence in the docket to support the state's action on both Acrolein and Ethylene Oxide since some of our organizations have been working to defend the federal findings on Ethylene Oxide for almost a decade.

We applaud the Office of Environmental Health Hazard Assessments efforts to embark on a new path to protecting the health of our communities from exposure to these highly toxic carcinogens and toward the longer term goal of reducing the emissions of these highly toxic compounds into our communities.

Cordially,

Jane Williams, California Communities Against Toxics

Robina Suwol, California Safe Schools, Van Nuys, California

Felipe Aguirre, Comite Pro Uno, Maywood, California

Janice Schroeder, West Berkeley Alliance for Clean Air and Safe Jobs, Berkeley, California

Bill Magavern, Coalition for Clean Air, Sacramento, California

Abigail DeSesa, Val Verde Community Organization, Castaic, California

Elise Cossart-Daly, Cossart-Daly Law, A.P.C., Santa Barbara, California

Linda Dallin, 1000 Grandmothers for Future Generations, San Francisco, California

Cher Arabalo, GOAL, Castaic, California

Ricardo PULIDO, Coalition for a Safe Environment, Carson, California

Rebecca Overmyer-Velázquez, Clean Air Coalition of North Whittier and Avocado Heights, Avocado Heights, California

Shoshana Wechsler, Sunflower Alliance, Richmond, California

Andrea Luna, East Yard Communities for Environmental Justice, Commerce, California

Matt Holmes, California Environmental Justice Coalition, Stockton, California

D.F.Gassman, Bay Area System Change not Climate Change, San Francisco, California

Bradley Angel, Greenaction for Health and Environmental Justice, San Francisco, California

Constance Beutel, Benicia Good Neighbor Steering Committee, Benicia, California

Jaime Sanchez, Neighbors Against Phibro Tech, Los Nietos, California

Jenna Roper, PhD, Central California Asthma Collaborative, Fresno, California

Michael Hayden, Lincoln Heights Community Coalition, Los Angeles, California

Modesto Pulido, Common Dreams, Wilmington, California

Teresa Marquez, Mothers of East Los Angeles, Boyle Heights, California

Cade DeVere, Desert Citizens Against Pollution, Rosamond, California

Don Osborn, Fresh Air Vallejo, Vallejo, California