AB 2588 Emission Inventory Criteria and Guidelines
Proposed Revisions to Appendix A Chemical List

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Presentation Outline

1. General Overview
   - Background
   - Program Overview

2. Review of Proposed New Substances
   - Selection Process
   - Questions for SRP

3. Next Steps
   - Timeline
   - Public Comment
   - SRP Review Outcome
General Overview
Background

CARB Presentation at June 28th SRP Meeting

- Overview of proposed updates to the regulation
- Statutory requirements for updating the chemical list
- Requested SRP’s assistance in reviewing list of proposed new substances
Air Toxics Hot Spots Program Overview

Program Overview
- Collect emission data
- Identify facilities having localized impacts
- Assess health risks and notify nearby residents of significant risks
- Reduce risks below a health-protective threshold

Emission Inventory Criteria and Guidelines
- Provide direction to facilities on how to compile air toxics emission data
- Appendix A includes list of chemical substances that must be reported
Appendix A Structure

Inventory Guidelines organize chemicals into 3 tables:

- Appendix A-I: substances for which emissions must be quantified
- Appendix A-II: substances for which production, use or other presence must be reported
- Appendix A-III: substances which need not be reported unless manufactured by the facility (e.g., pharmaceuticals)
Review of Proposed New Substances
Selection Process

- Staff evaluated over 1,300 substances in consultation with OEHHA and DPR
- Selection Criteria
  - Recognized toxicity under one of the six lists mandated by the AB 2588 statute (or under CARB’s Authority)
  - Can the substance become airborne and be present in California?
- 812 new substances are being proposed for addition
  - A-I: 639 substances
  - A-II: 11 substances
  - A-III: 162 substances
- 548 substances were screened out (not proposed for addition)
Substance List for SRP Review

On August 13, 2019, CARB provided four documents for SRP review:

- SRP Chemical List Introduction
- Existing Appendix A
- Master List of New Proposed Substances
- New Proposed Appendix A-I Substances by Category

- Carcinogens
- Developmental and Reproductive Toxicants
- Pesticides
- Metals
- Other Inorganics
- Pharmaceuticals
- Neurotoxins
# New Substances Breakdown by Category

<table>
<thead>
<tr>
<th>Category</th>
<th>Count*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carcinogens</td>
<td>200</td>
</tr>
<tr>
<td>Developmental and Reproductive Toxicants</td>
<td>134</td>
</tr>
<tr>
<td>Pesticides</td>
<td>117</td>
</tr>
<tr>
<td>Metals</td>
<td>22</td>
</tr>
<tr>
<td>Other Inorganics</td>
<td>20</td>
</tr>
<tr>
<td>Pharmaceuticals**</td>
<td>154</td>
</tr>
<tr>
<td>Neurotoxins</td>
<td>123</td>
</tr>
<tr>
<td>Other</td>
<td>348</td>
</tr>
</tbody>
</table>

* The counts by category may overlap (e.g., a substance could be both a pesticide and a DART)

** The majority of Pharmaceuticals were added to Table A-III (substances which need not be reported unless manufactured by the facility)
Questions for SRP

1. Are we missing any important air toxic chemicals from the proposed list?

2. Are the “functional group” characterizations for emerging chemicals appropriate and adequate? Are there other functional groups to add?

3. Are there any chemicals on the “Not Proposed for Inclusion” list that should be included in one of the Appendices?
Are we missing any important air toxic chemicals from the proposed list?

- AB 2588 Statute specifies six source lists for CARB to review in compiling the list of chemicals
- The statute also gives CARB explicit authority to include other chemicals of concern
- Staff want to ensure we have been comprehensive in our analysis of additional chemicals to add to the list
Are the Functional Group characterizations adequate?

CARB staff have proposed 3 new “functional group” categories:

- Poly- and per-fluorinated chemicals (i.e., PFAS related)
- Derivatives and substituted versions of polycyclic aromatic compounds that contain any halogen atom (chlorine, bromine, fluorine, or iodine)
- Any chemical containing the isocyanate functional group.
Should any chemicals “Not Proposed for Inclusion” be included?

Over 500 referenced substances were deemed as not meeting selection criteria. Reasons for screening out substances included:

- Listing was not an air-related substance
- Listing was IARC Group 3 (insufficient evidence for cancer) and CARB/OEHHA staff did not find other evidence of toxicity
- Not likely to become airborne (e.g., high boiling point, high molecular weight, and/or not used in a manner that could become fugitive dust)
Next Steps
Desired Outcome of SRP Review

CARB is seeking written SRP recommendations that provide:

- SRP’s scientific acceptance of the proposed new substances, or
- Recommended additions or deletions to the list; and
- Guidance on the appropriateness of using functional groups as the basis for listing groups of substances
October 4, 2019: SRP discusses the chemical list
November 22, 2019: SRP webinar to continue discussion on the new substance list
SRP issues preliminary recommendations after November 22 webinar (by February 2020 if necessary)
SRP issues final recommendations by late 2020/early 2021
EICG Regulation Amendment Timeline

- Public workshops expected to start in early 2020
- CARB aims to take the amended regulation to Board in late 2020
- CARB will update SRP on any final changes to the list after the CARB Board hearing
Public Comment

- The new substance list is open for public comment as part of both the SRP Review and the EICG Regulation Amendment process.
- The public comment period for the SRP review process has been extended until November 8, 2019.
- Comments provided by the above deadline will be addressed at the SRP webinar on November 22, 2019.
- Comments provided after the November 8 deadline will be addressed as part of the EICG regulation amendment public process.
Public Comment (Cont.)

Please email your comments to one of the following recipients:

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Questions for SRP Discussion

1. Are we missing any important air toxic chemicals from the proposed list?

2. Are the “functional group” characterizations for emerging chemicals appropriate and adequate? Are there other functional groups to add?

3. Are there any chemicals on the “Not Proposed for Inclusion” list that should be included in one of the Appendices?