Hello,

Environmental Health Coalition (EHC) is very pleased to have the opportunity to express our overarching support for the SDAPCD proposed revisions of Rule 1210. Most significantly EHC supports the long overdue revision of the **Significant Risk Threshold to 10 cancers per million**. It establishes a health-protective emission limit for stationary sources, which will result in a requirement to appropriately reduce cancer risks. This change is very significant and meaningful in the real world as it reduces the chances of contracting cancer by 10 times. It also provides consistency with the public notification level of 10 cancers per million which has been in place for many years. It is confusing and distressing for the public to receive notification of exposure to harmful pollution levels without an action plan for reducing these emissions. This rule change is a significant step towards environmental justice as toxic air contaminant (TAC) emitting facilities are not evenly spread throughout the region.

EHC is requesting revisions to the proposed rule including:
- require public notification to be annual;
- empower the APCO to reduce the compliance period for emission reductions should information become available that demonstrates feasibility and/or health impact
- restrict compliance extensions to one 5 year extension

EHC understands that there are complexities associated with transitioning industrial equipment to reduce emissions and we are cognizant of the economic challenges as well. We trust the APCD Governing Board will make the best decisions to ensure that harmful pollution is reduced to protect public and worker health as well as jobs.

Thank you,

Diane

DIANE TAKVORIAN · EXECUTIVE DIRECTOR
(SHE/HER/HERS)

Environmental Health Coalition | *Environmental Health & Justice Campaign*
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