



BAAQMD Rule 11-18 Draft HRA for AB&I Foundry

Air District Responses to:

Frequently Asked Questions and Comments from May 7, 2021 Workshop and Public Comment Period, Ended on June 8, 2021

Background

AB&I Foundry has been producing cast iron products in the Bay Area for over a hundred years. AB&I is a major West Coast producer of cast iron drain, waste and vent system pipes and fittings.

Under Regulation 11 Rule 18 (Rule 11-18), which seeks to reduce health risks from toxic emissions from existing local facilities, the Air District conducted a draft health risk assessment (HRA) for AB&I Foundry. The Air District found that AB&I Foundry has elevated health risks due to stationary source emissions and made a draft determination that AB&I must reduce these health risks.

On May 7, 2020, the Air District and Communities for a Better Environment (CBE) co-hosted a workshop to explain the draft HRA results, inform the public about the health risks associated with AB&I Foundry, and collect public comment on the draft HRA and next steps. In addition to comments made at the workshop, the Air District collected written comments on the draft HRA through June 8, 2021.

This document provides the Air District's responses to the most frequently asked questions and comments related to AB&I Foundry and the Rule 11-18 draft HRA. Some comments require additional investigation. The Air District will include responses to all comments in the final HRA Report.

Odors

Comments – Many people complained about odors that they believe are coming from the AB&I Foundry. They expressed concerns about the strong intensity of the “awful” or “foul” odors, the frequency that odor problems occur, the long duration of odor issues in the area, and health impacts from exposure to odorous compounds. Many people described having headache, sore throat, nausea, breathing difficulty, or asthma attacks from exposure to odors. Others reported quality of life impacts, such as not being able to open windows, go outside, or exercise due to odors.

Response – The Air District has noted the rise in odor complaints in East Oakland since 2019 and has dedicated significant resources to identifying the origin of the odors and reducing the odorous emissions. The Air District has issued 3 Public Nuisance violations to AB&I Foundry since October 2019 due to odors and has determined that most of the odors are associated with sand molding operations that use a phenol resin binder. Air District enforcement efforts have resulted in replacement of mold binders with less toxic materials, installation of wind breaks and enclosures, baghouse repairs, and improved housekeeping procedures designed to improve the capture of fugitive emissions and reduce odors in the community. Staff continue to work with AB&I to explore additional odor controls for several operations. In addition, the Rule 11-18 HRA has identified significant sources of health risk at AB&I. These significant risk sources may also contribute to odor issues from AB&I. Air District requirements to change processes and operations to reduce toxic emissions from significant sources will also reduce odors from AB&I. AB&I announced that sand molding operations will be moved to Texas, and the Air District believes that move will significantly reduce (but not eliminate) odor issues as well.

Odor Complaint Response Procedures

Comments – Several comments were made regarding the Air District’s responses to odor complaints. Commenters reported that it often takes too long for inspectors to respond to a complaint (the odor is gone when the inspector arrives) and that some inspectors are intimidating or don’t treat people with respect.

Response – The Air District takes odor complaints seriously and strives to respond to every complaint quickly and professionally. We regret that anyone has felt intimidated or treated unprofessionally. We will review our complaint response procedures and staff training to ensure that staff treat the community respectfully.

Comments – Several comments stated that the methods used to identify odors are too subjective and unscientific.

Response – Portable instrumentation that is capable of detecting compounds at odor threshold levels is not commercially available. Human noses are very sensitive and are often the best method available for identifying and characterizing odors. Inspection staff are trained in odor detection techniques and as such are best equipped to identify and understand odor issues.

Comments – One commenter objected to AB&I workers arriving at their house after filing a complaint with the Air District.

Response – The Air District notifies a facility when odor complaints allege them as the source of odors so that they can investigate and eliminate the problem as quickly as possible. However, odor complainant identity and contact information are never divulged to the facility and is kept confidential to the fullest extent allowed by law.

High Health Risk Levels

Comments – Many people expressed outrage regarding the high health risk levels that were identified in the draft HRA for AB&I Refinery and demanded that action be taken to reduce or eliminate these health risks. Commenters described their concerns about their health and children's health due to exposure to AB&I Foundry's toxic air contaminant emissions. A few commenters described AB&I Foundry as the worst polluter in the community.

Response – The Air District shares the community's concern about the elevated health risks associated with AB&I Foundry's stationary source operations. In November 2017, the Air District adopted Regulation 11, Rule 18 (or Rule 11-18) to enable the Air District to identify threats to community health from existing facilities and to take action to reduce these toxic emissions. Rule 11-18 uses HRAs as a diagnostic tool to determine which facilities and which sources have elevated health risks that must be reduced. The exposure and health risk numbers in these HRAs represent health protective scenarios. The draft HRA for AB&I Foundry was a critical first step in this risk reduction process. It showed that AB&I's health risks exceed Rule 11-18 risk action levels and identified the major sources that require further control. The Air District is committed to ensuring that health risks from AB&I Foundry are reduced as quickly as possible.

Comments – Several people stated concerns about hexavalent chromium emissions being deposited into soil at homes, schools, and parks and potentially contaminating their food supply from back yard gardens, eggs, and chickens. They also asked how to keep themselves safe from hexavalent chromium emissions and other toxic emissions until the health risks are reduced. Several commenters noted that leaving the area is not feasible for many people and that practical protections and soil evaluations are needed.

Response – The Air District shares these concerns and is committed to reducing health risks from AB&I Foundry. For hexavalent chromium, health impacts primarily occur through inhalation

of particulate matter in ambient air at locations where concentrations of hexavalent chromium particulate matter may be high. These locations may generally occur within about 1/2 mile of the AB&I Foundry with higher concentrations located closer to the facility.

East Oakland is one of several communities slated for additional actions in the future to improve air quality under the AB 617 program. This program directs local air districts to work with heavily impacted communities on emission reduction programs and/or air quality monitoring campaigns to address specific local concerns, such as the ones identified in these comments, and to lessen community risk as soon as possible.

Comments – A few people asked why it took so long for the Air District to determine that AB&I's health risks are exceeding risk action levels.

Response – During the last twenty years, there have been a combination of technical and regulatory factors that have led to the Air District's finding that health risks from AB&I Foundry are too high and must be reduced. Several important changes that have occurred within just the last year and a half include: (a) Rule 11-18 risk action levels were reduced to 10 in a million on January 1, 2020, and (b) Air District staff improved AB&I's hexavalent chromium emission inventory in late 2020 and early 2021. These recent changes had a large influence on the draft HRA finding that AB&I's estimated health risks exceed the current risk action levels in Rule 11-18.

In addition to the above, the Air District has determined that health risks throughout the Bay Area are higher for the same emission levels due to implementation of more conservative health risk estimation procedures. The Office of Environmental Health Hazard Assessment (OEHHA) updated their state-wide health risk assessment guidelines in 2015 to be more protective of children's health. The combined impacts of OEHHA's 2015 updates were that, for most pollutants, estimated health risks determined using the new procedures are 2-4 times higher than health risk estimates made using the 2003 procedures. In addition, the Air District has found that health risks due to hexavalent chromium emissions now have a much larger impact on total Bay Area health risks than previous estimates. Thus, hexavalent chromium has been identified as a key toxin of concern for the Bay Area.

Furthermore, as health risk estimates increased for the same emission levels, the Air District adopted more stringent health risk limits. Adoption of Rule 11-18 lowered the risk action levels by 10 times; cancer risk action levels were reduced from 100 in a million before November 2017, to 25 in a million on November 15, 2017, and then to 10 in a million, effective January 1, 2020. Thus, the overall stringency of the Air District's cancer risk reduction requirements has increased by 20-40 times since 2003, depending on the site's specific pollutant profile.

Finally, due to Rule 11-18 requirements and procedures, the Air District updated the emissions inventory for AB&I Foundry. These updates focused on one of the key toxic pollutants in the Bay Area: hexavalent chromium. Staff research has improved identification of both the processes that emit hexavalent chromium and the amount of those hexavalent chromium emissions. These investigations led to more source testing at AB&I Foundry to identify hexavalent chromium emissions. Although source testing challenges regarding hexavalent chromium have hampered these efforts, the Air District developed reasonable improvements to the hexavalent chromium emission inventory for AB&I Foundry (during 2020-2021). These inventory improvements included the identification of pipe casting machines as a source of hexavalent chromium emissions (previously there were no known hexavalent chromium emissions from these sources). For the pipe casting machines, source test data is not available; therefore, the Air District used an emission factor to estimate hexavalent chromium emissions from pipe casting machines. For the cupola and sand mold pouring, cooling, and shakeout areas, which are abated by baghouses, source test data was used to estimate abated hexavalent chromium emission rates from the baghouses and fugitive emissions from these sources. An updated emission inventory data was included in the most recent draft HRA. District staff are continuing to improve this emissions inventory and plan to incorporate additional inventory corrections and improvements into the final HRA.

In summary, the Air District's increased program stringency combined with the toxic emission inventory improvements for AB&I Foundry culminated in the draft HRA's finding that health risks from this facility are too high and must be reduced. In 2020, the Air District's cancer risk action level dropped from 25 in a million to 10 in a million, and Air District staff updated the hexavalent chromium emission estimates for key sources at AB&I. These most recent changes had a large influence on the draft HRA finding that health risks exceeded risk action levels and must be reduced.

Health Risk Concerns During Pregnancy, for Children, and at Schools

Comments – Several commenters expressed concerns about health risks related to fertility, fetal development, young children in day care facilities, and older children at schools.

Response – Using residential exposure assumptions for all potential receptor locations is the most conservative assumption and results in higher risk estimates than using worker exposure assumptions or student exposure assumptions. Worker and student exposure assumptions are refinements that can be applied to receptor locations where people do not live for a period of 6 months or more. Although the Air District reported maximum cancer risk for a subset of the receptors (where permanent residences were known to exist), the risks were calculated using the residential receptor exposure assumptions for all receptor locations. This residential risk is shown by the map on page 166 of the draft HRA in Appendix K.

The draft HRA for AB&I Foundry also includes consideration of fertility and developing fetuses, young children that may attend preschools or day cares in the area, older children in school, and health risks for children who may be exposed over a long period of time. The OEHHA health risk assessment procedures that were updated in 2015 include a number of new assumptions for cancer risk that were specifically intended to be protective of children's health. The new procedures include a set of assumptions (such as breathing rates, dermal exposure rates, ingestion rates, fraction of time at home, and others) for the following age groups: the third trimester of pregnancy, ages 0-2 years, ages 0-9 years, ages 2-16 years, ages 16-30 years, and ages 16-70 years, which improve dose and exposure estimates for children. In addition, these procedures include age-based sensitivity factors that reflect the higher sensitivity of a developing fetus or a young child to the effects of carcinogenic compounds. The residential exposure scenario is the most conservative scenario, and it assumes a 30-year exposure duration where this exposure starts during the third trimester of pregnancy through age 30 years. Fraction of time at home estimates consider time that children may be away from home during elementary/middle school year (assumes 9 years for a K-8 school) and high school years (4 years), but the residential exposure scenario assumes children are present at a residence during the day care or preschool years, which is the most conservative assumption.

Historical Impacts

Comments – During the workshop, a presenter explained how redlining and other historical policies have led to East Oakland residents being exposed to high pollution levels and being subjected to environmental racism. Several commenters expressed feelings of oppression, fear, and anxiousness due to air pollution and odors in the area. Several commenters demanded that clean air is a right that all people should have.

Response – The Air District acknowledges that air pollution levels are high in the East Oakland community. The Air District is committed to reducing air pollution exposure in impacted communities. East Oakland is one of several communities slated for additional actions to improve air quality under the AB 617 program, which directs local air districts to work with heavily impacted communities on emission reduction programs and/or air quality monitoring campaigns.

Comments – Several commenters expressed concerns about long term impacts from past exposures.

Response – The HRA process provides an estimate of health risks based on a single year of emissions inventory. Cancer risk estimates for residents assume the resulting exposure occurs for 30 years. Year to year variations in emissions and the resulting health impacts may occur.

It is also possible that emissions and the associated health risks may have been higher in this area in previous years before current emission controls at this facility were installed. However, the purpose of this Rule 11-18 HRA is to determine if current controls are adequately health protective. Estimating potential past exposures and their impacts is extremely difficult to do and is currently outside of the scope of work for Rule 11-18.

Cumulative Health Risks

Comment – One commenter asked what the Air District is doing to reduce emissions from other companies and other sources of air pollution in this area.

Response – East Oakland is one of several communities slated for additional actions in the future to improve air quality under the AB 617 program, which directs local air districts to work with heavily impacted communities on emission reduction programs and/or air quality monitoring campaigns. This includes seeking to expend grant dollars to reduce emissions from on and off-road diesel particulate matter sources and utilizing permitting and enforcement tools to lessen community risk as soon as possible.

Risk Reduction Timing and Urgency

Comments – Many commenters stated that the implementation time periods in Rule 11-18, which are expected to require final completion of risk reduction measures by 2028, are too long and should be reduced. Commenters expressed the need to urgently act to reduce the high health risks in this community and asked that the Air District shorten risk reduction times as much as possible, take action to reduce risks immediately, and permit abatement controls quickly to reduce delays.

Response – The Air District has considered these comments and is taking both tactical and strategic steps to try to accelerate work to reduce emission at this and other Rule 11-18 facilities, including procedural and regulation changes. Additionally, the Air District has been and will continue to use all available regulatory, communications and enforcement resources to ensure AB&I reduces health risks as quickly as possible. The Air District plans to expedite permit applications for abatement equipment and other controls at this facility.

AB&I Should be Shut Down

Comments – Many commenters stated that AB&I should not be permitted to operate and that the facility should be shut down or operations halted until all risk reductions are in place.

Response – The Air District may seek authority to shut a facility down or revoke a facility’s permit to operate if the facility is continuing to violate orders, rules, or regulations. The Air District will continue to closely monitor AB&I’s compliance status and will take enforcement action as appropriate up to and including an action to force the facility to cease operations. However, at the present time, the Air District believes AB&I’s record of intermittent violations would not support seeking an order to shut down the facility. District Rule 11-18 provides a mechanism for reducing risks posed by facilities exceeding risk thresholds regardless of whether they are in compliance with other air regulations.

Exposure – Identification of Residential Receptors

Comments – Many commentors stated that the residential receptor locations identified in the HRA did not include all areas where people may live. The commentors stated that there are groups of unhoused people camping near the facility and that these unhoused people were not considered in the draft HRA.

Response – The Air District calculated health risks for a residential receptor exposure scenario for all receptor locations outside of the facility boundary. However, health risks were reported in the summary table for only a subset of these locations where residents were known to be living. The Air District has re-examined this analysis and agrees to report the maximum health risks for any locations where people may reside for a period of six months or more out of a year, which is consistent with the Regulation 2-5-220 definition of residential receptor. As discussed in Section 3.11 of the Air District’s HRA Modeling Protocol, receptor locations may include indoor and outdoor area. The Air District concurs that residential receptor may include locations where unhoused people reside. To ensure that all people in the area are included in this analysis, the Air District has sought to include areas where unhoused populations may be present for six months or more such as locations east of the rail tracks on 77th Avenue. The final HRA will include this change in the locations for reported health risks for residential receptors.

Exposure – Identification of Worker Receptors

Comments – Many commentors stated the worker risk is underestimated because it does not include AB&I workers. They also commented that the Air District should protect AB&I workers.

Responses – In general, the Air District’s regulations apply to the “atmosphere.” However, Regulation 1-105 states that:

“District Regulations are not intended to apply to the air quality requirements for the workroom atmosphere necessary to protect an employee's health from contaminants emitted by the source; nor are they concerned with the occupational health factors in an employer-employee relationship.”

Workroom atmosphere and other locations within a facility's property boundary are under the regulatory control of other agencies, such as the federal Occupational Safety & Health Administration (OSHA) and Cal/OSHA. Furthermore, Regulation 11-18-208 defines an exposed individual as [emphasis added]:

“A person who is exposed to TACs emitted from a toxic risk facility. Exposed individual includes a resident, student, or worker who is not an employee of or a contractor for the toxic risk facility.”

Therefore, the Air District cannot include AB&I workers in a Rule 11-18 HRA because such workers are both generally excluded from District regulations by Rule 1-105 and specifically excluded from a Rule 11-18 HRA by Regulation 11-18-208.

Exposure Scenarios

Comment – A few commenters stated that reporting risk separately for residents, students, and workers underestimates risk for those who both live and work or attend school in the area (especially for those who work at AB&I), and it does not fully show risks for all who may be exposed.

Response – The draft HRA identifies potential locations for exposed individuals, which are called receptor locations, or simply receptors. The different health risk scenarios reported in the draft HRA are necessary to ensure that all potential exposures at each receptor location are properly characterized. To ensure public health protection, the highest modeled exposure concentration, for specific land-use designations, are assumed when assessing health risk for all receptors. It is not possible to evaluate the potential exposure for each individual that lives, travels, and works in various locations throughout the day. Instead, OEHHA has developed standardized exposure scenarios to represent the potential exposures that may occur at any particular receptor location due to emissions from a facility. For any given receptor location and exposure amount, the residential exposure scenario results in the highest health risk estimate and is the most conservative risk estimation approach. This residential risk estimation approach has been used to estimate health risks at all receptor locations. However, some receptor locations are within industrial areas or at businesses where people do not generally live. In these cases, a worker exposure scenario has also been used to estimate health risks at potential off-site worker receptor locations. In other words, both resident health risks and worker health risks have been calculated for each receptor location. When reporting the maximum impacts for each standardized exposure scenario, the Air District considers the types of exposures that are possible for the receptor locations with the highest combined exposures from all sources at the facility.

HRA Domain

Comments – Many people stated that the HRA should include a larger exposure area and should include all areas where people have complained about odors. Also, HRA results should be compared to odor complaint locations to “ground truth” health impacts.

Response – The draft HRA was developed for the purpose of identifying the maximum impact locations. It was not meant to identify all potential exposure locations. Exposures at receptor locations that were not included in the draft HRA’s domain will be much lower than locations within the highest impact areas. Ultimately, exposures at these farther locations will not impact the Air District’s determination of maximum facility risk and maximum source risks. To the extent possible, the Air District can expand the modeling domain, but vastly increasing the number of receptors creates computational difficulties. It may not be possible to include all areas noted in the comments.

It is not known at this time whether any of the TACs that are evaluated in the HRA can be directly linked to odors detected in the community. “Ground truthing” the HRA results would require significant additional analyses and ambient air monitoring in the community. These types of analyses are beyond the scope of Rule 11-18 and are better suited for consideration under the AB617 Community Health Protection Program.

Permits

Comments – Many commenters stated that exempting pipe casting machines from permit requirements is unacceptable and demanded that the Air District permit these sources of high toxic emissions and require controls.

Response – The Air District concurs that AB&I’s pipe casting machines require permits. The Regulation 2-1-122.1 exemption from permit requirements for “molds used for the casting of metals” is contingent upon the source meeting the requirements of Regulation 2-1-319. Regulation 2-1-425 also gives the Air District the authority to require permits for any source that emits toxic air contaminants in quantities deemed appropriate by the APCO.

The Air District notified AB&I Foundry on May 3, 2021 that the Regulation 2-1-122.1 exemption was not valid for the pipe casting machines due to the quantities of toxic air contaminants emitted from these sources and that permits are required. AB&I responded on July 1, 2021, by submitting permit application number 31131 for these pipe casting machines. The Air District is evaluating this permit application.

Compensation

Comments – Many commenters asked that AB&I Foundry acknowledge the health burden they have placed on the people of East Oakland and compensate people for this health burden. Some commenters asked that the Air District charge penalties to AB&I due to health impacts and use these penalties to improve health in the community.

Response – The Air District can seek penalties for violations of District, state or federal regulations. Air District Rule 11-18 is intended to address the health burden of a facility on the community. As the Rule 11-18 process is implemented at AB&I, the Air District will closely monitor compliance and will seek penalties as appropriate for any violations.

The Air District has issued 3 public nuisance violations and 2 other violations to AB&I Foundry and will be pursuing penalties for those violations. The penalties that are recovered by the Air District will go toward funding Air District operations which are intended to improve community health by managing air quality. As mentioned, East Oakland is one of the communities slated for additional actions to improve air quality and reduce health impacts under the AB 617 program, which focuses on heavily impacted local areas.

Compliance

Comments – A few commenters expressed concern that AB&I Foundry may not be following all required procedures and using all required controls.

Response – The Air District's authority is to ensure that AB&I complies with all applicable regulations and rules permitted by the Air District and by the federal Title V permit. The Air District conducts a facility-wide compliance verification at AB&I Foundry biannually, as required by the federal Title V program, and any instance of non-compliance results in a Notice of Violation and requires the facility to return to compliance as soon as possible.

Air District staff investigate every AB&I Foundry complaint received to ensure the facility is in compliance with the applicable requirements and will take enforcement action when non-compliance is confirmed. AB&I Foundry was determined to be operating in compliance with its Permit to Operate issued by the Air District and its federal Title V permit at the most recent facility inspection performed by Air District staff in September 2020.

Comments - Several commenters stated that AB&I Foundry is a public nuisance and is not a good neighbor. One commenter stated that the pipe casting machines should be deemed a public nuisance due to the health impacts and the controls should be required immediately to prevent further nuisance violations.

Responses – As mentioned, the Air District has issued 3 public nuisance violations to AB&I Foundry for odors since October 2019 and will be pursuing penalties for those violations. However, none of these odor nuisance violations were confirmed to be from the pipe casting machines. As mentioned, the Air District is requiring that AB&I obtain permits for the pipe casting machines and expects to require emission controls for these machines pursuant to Rule 11-18.

Inventory

Comments – Many people and entities, including EPA, CBE, and AB&I, provided comments about the emission inventory developed for the draft HRA. Most of these comments concerned hexavalent chromium emission factor determinations and baghouse capture and control efficiency assumptions that were used to estimate fugitive emissions. A few comments identified potentially missing sources or pollutants. One comment expressed concern about annual variability of emissions and asked the Air District to describe these potential impacts on risk results. Other comments stated that Air District emission estimates for certain pollutants (hexavalent chromium, mercury, and nickel) were too high.

Response - Each of the emission inventory comments will require a more detailed review and further investigations. The Air District will consider these comments in more detail as we prepare an updated emission inventory for AB&I Foundry that will be used in the final HRA. Detailed responses to each of the inventory related comments will be include in the report for the final HRA.

Jobs

Comments – Several commenters stated that the community wants healthy jobs and that we should be able to have both clean and green jobs.

Response – The Air District supports clean and green jobs.

Funding

Comments – Several commenters expressed support for bringing funding to East Oakland to achieve risk reductions in the community.

Response – As mentioned, East Oakland is one of the communities slated for additional actions to improve air quality under the AB 617 program. There is a link to sign up for AB 617 information email list and to apply for grant moneys on the Air District website at: <https://www.baaqmd.gov/community-health/community-health-protection-program>.

Procedures

Comment – Using a timer and cutting people off is disrespectful.

Response - The Air District strives to create respectful and inclusive public meetings by managing time and creating equitable space for all to participate during public meetings. The timer was a tool that is commonly used at public meetings to help manage the amount of speakers when large numbers of speakers are expected (there were more than 80 commenters at the meeting). It was not meant to be disrespectful; however, the Air District has decided to stop using a timer during most public workshops. In addition, the Air District offered multiple additional avenues for the public to submit comments (for example, through the meeting chat, using the web site, and in writing by email.)

Comment – The Air District should use air monitoring rather than modeling to more scientifically determine health risks.

Response - Air monitoring is working with Communities for a Better Environment to make air monitoring accessible and is one tool for gathering information about air quality impacts. Modeling is another tool and is a standardized and cost-effective method for predicting how pollutants will be transported into a community. However, the Air District is seeking to expand its tools to better understand emissions in the East Oakland community and hopes, that as part of its possible inclusion in the AB617 program, that more monitoring resources can be deployed in the area.

Purpose

Comment – One commenter asked how these workshops are actively helping people and what do we want or need from the community.

Response – The workshops are intended to share information with the community, and to provide the community with an opportunity to ask questions and inform decisions that affect the community. The Air District strives to be transparent and encourages community involvement in achieving air quality improvements in East Oakland. Partnering with Communities for a Better Environment was intended to make the information accessible, including to Spanish-speakers, and to broaden the outreach to the East Oakland community.

Agency Effectiveness

Comments – Several commenters stated that the Air District was inefficient, corrupt, racist, or derelict in protecting air.

Response – The Air District is working to reduce air pollution in communities historically impacted by racism and heavily burdened by air pollution. We have come along way and are continuously improving diversity, equity, and inclusion considerations in both internal and external procedures, policies and programs.

Comment – Several commenters expressed anger or disappointment with Alameda County Supervisor and Air District Board Member, Nate Miley regarding his expressed support for AB&I and acceptance of campaign contributions. One commenter stated that politicians don't care.

Response – As a member of the Air District's Board Supervisor Miley has provided extensive leadership on air quality over his 20-year tenure, including pushing for the adoption of Rule 11-18. Additionally, as a result of this public meeting, the Supervisor met with Air District leadership to demand that all feasible actions be taken to ensure quicker emissions reductions at the AB&I. For additional questions or comments, please contact Supervisor Nate Miley's office regarding these concerns.