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October 28, 2013

Mr. Ed Eckerle
Planning, Rule Development and Area Sources
South Coast Air Quality Management District (AQMD)
21865 Copley Drive
Diamond Bar, CA 91765

Subject: Proposed Amended Rule 1420.1

Dear Mr. Eckerle:

As mayor of the City of Vernon, I would like to formally submit comments on the subject of South Coast Air Quality Management District's (AQMD) proposed amended Rule 1420.1, "Emission Standards for Lead and Other Toxic Air Contaminants From Large Lead-Acid Battery Recycling Facilities".

I appreciate the time your agency has taken to draft this proposed rule and for giving me the opportunity – on behalf of the residents, and public and private sector employees of my city – to express my concerns about the proposed amended rule.

As stated in your Preliminary Draft Staff Report for Proposed Amended Rule 1420.1 dated September 2013, only two facilities would currently be subject to the new rule: Exide Technologies based in Vernon and Quemetco, Inc. based in the City of Industry.

As Mayor of the City of Vernon, I want to ensure that everything possible is being done by your agency to protect the health and safety of our residents; the more than 55,000 employees working daily in the City of Vernon; and any nearby communities potentially affected by harmful emissions of lead, arsenic, benzene or 1,3-butadiene. To that end, I strongly support the improved emission reduction requirements contained in proposed amended Rule 1420.1.

Considering the tens of thousands of people who have been exposed to harmful emissions from Exide Technologies based on your agency's studies and emissions monitoring during this past year, I would ask that AQMD strongly urge Large Lead-Acid Battery Recycling Facilities to implement the best available technologies to reduce the amounts of lead, arsenic, benzene and 1,3-butadiene emitted to acceptable levels. This would ensure that these types of facilities are doing everything possible to reduce the

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emission levels of these harmful chemicals. As illustrated in your presentation at the October 9, 2013 Rule 1420.1 Working Group Meeting, Quemetco Inc. has already met the proposed point source emission limits written into the Proposed Amended Rule 1420.1 and have achieved these limits by a significant margin.

I believe we must do everything we can to protect the health and safety of our city's residents and workers who've grown increasingly alarmed by the potential health risks they may face by their continued exposure to harmful emissions. Your agency has a great opportunity to set, monitor, and enforce stringent standards for facilities of this type to protect our community and improve the environment.

I further believe that AQMD should employ the best available technology to accurately monitor and record emissions. Immediate public notification and disclosure of potentially harmful emissions should be included as a corporate public information requirement for lead acid battery recycling facility operators. A concerned public should not have to wait for news organizations to report on incidents of potentially harmful emissions. The companies that own and operate these recycling facilities should be ordered to inform the public, forthwith, whenever they exceed any regulatory limits in regard to lead, arsenic and other harmful chemical compounds.

I strongly urge you to take my comments into consideration when you prepare your final rule.

Respectfully,



W. Michael McCormick
Mayor