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Sent Via Email

October 6, 2023

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**RE: COUNTY PUBLIC HEALTH'S RESPONSE TO CTEH'S OCTOBER 2, 2023
HEALTH RISK SCREENING MEMORANDUM**

Dear Dr. Sanchez-Soria and Dr. Perez,

The County of Los Angeles Department of Public Health (Public Health), as a member of the Technical Advisory Committee (TAC), has reviewed CTEH's October 2 Health Risk Screening Memorandum (Memorandum) with the TAC's expert Roux Associates. This review has determined that CTEH's conclusive statement in the Memorandum: that after its "*review of the continuous air monitoring and discrete air sampling data, there is no evidence of increased health risk to the community*" is not supported by sufficient data or analysis, is premature and misleading. CTEH has not presented sufficient air monitoring data or analysis of that limited data to make any conclusive statement about the health risks posed to the nearby communities from the significant increase in landfill gases emanating from the Chiquita Canyon Landfill. As such, the Memorandum is inadequate, and the TAC and the nearby communities deserve better.

The TAC has the following issues with CTEH's Memorandum:

- A. There is no quantitative backup for CTEH's claim that there is no evidence of increased health risk to the community:
 1. CTEH did not present a summary of analytical samples compared to appropriate screening values.
 2. CTEH did not provide their selection of appropriate screening values.
 3. CTEH did not assess the appropriateness of detection limits relative to screening values.

4. CTEH did not present cumulative risk estimates as discussed in the September 29, 2023 response to comments and Scope of Work, Paragraph 5.0.
5. CTEH did not perform any type of analysis comparing concentrations of TO-15 VOCs detected onsite vs. offsite sources.

B. CTEH states that "*Six percent of real-time continuous air monitoring readings were above the California Ambient Air Quality standard for H₂S, which means that odors may have been perceived in the community during the month of August 2023*"

1. There was no spatial or temporal analysis of this data.
2. Data analysis and comparisons (backup) were not provided.

The TAC finds that it is premature to make such a broadly worded public statement that there is no evidence of increased health risk to the community. Public Health, the TAC and Roux Associates have instructed CTEH to initiate and increase the breadth and scope of its community air monitoring, sampling and data analysis to include, not only hydrogen sulfide and dimethyl sulfide (DMS), but also sample for TO-15 VOC constituents, reduced sulfur compounds and particulate matter. To the TAC's knowledge that sampling and analysis has not yet begun. This analysis, which CTEH has agreed to perform, is to address short and long-term health impacts, if any, due to the increased landfill gas emissions. Public Health and the TAC expects to continue to receive all air monitoring data and analysis from CTEH on the 21st of each successive month.

It is the goal of Public Health and the TAC to ensure that the comprehensive air monitoring collection, sampling, and testing is performed and communicated in a manner that provides the exposition of an appropriate analytical framework which allows for the making of conclusive and correct statements regarding potential health risk that may be posed to the nearby communities. To that end, CTEH has committed to producing a technical report detailing the methods, results, findings and conclusions from the air monitoring and sampling data review by January 5, 2024. It is critical that Public Health and the TAC have regular, monthly access to the future data collected and an explanation of CTEH's analysis of that data, so that the TAC's consultant, Roux Associates, can evaluate both the data and CTEH's analysis and determine if there is eventual agreement with CTEH's community health risk conclusions. The surrounding communities deserve this assurance.

Although Public Health and the TAC believe it is premature for CTEH to make such a conclusive statement regarding potential health risks to community members, we look forward to working closely with CTEH throughout this process.

Sincerely,

Nichole Quick

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