



# South Coast Air Quality Management District

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*Office of the Executive Officer*  
*Wayne Nastri*  
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February 5, 2021

The Honorable Farrah N. Khan  
Mayor  
City of Irvine  
1 Civic Center Plaza  
Irvine, CA 92606

Re: South Coast AQMD Efforts at All American Asphalt

Dear Mayor Khan,

Thank you for your letter dated January 19, 2021 addressed to Dr. William Burke, Chairman of the South Coast Air Quality Management District (South Coast AQMD) Governing Board. Dr. Burke asked me to respond on his behalf. South Coast AQMD takes the situation regarding All American Asphalt (AAA) seriously, and we remain committed to doing everything within our authority to protect the residents of Irvine. As you know, we have an ongoing investigation concerning AAA, and our enforcement staff continue to conduct on-site inspections at the facility and respond to all air quality complaints.

In addition, South Coast AQMD is continuing its air monitoring effort in the community, which is looking for gaseous air toxics. This effort is based upon strict quality control criteria and analysis based upon U.S. EPA guidance methods. Using federal guidance methods allows us to confidently compare data with health-based thresholds and other air toxics measurement programs that have been conducted nationwide. South Coast AQMD also has recently expanded these efforts to include a third sampling location at Eastwood Elementary School.

The data from our air monitoring efforts is published on South Coast AQMD's website as it becomes finalized and can be found at: <http://www.aqmd.gov/home/news-events/community-investigations/all-american-asphalt/air-sampling-initiative>.

As you are aware, there are additional monitoring efforts using other methods being conducted by the community with support from advisors who are faculty at the University of California, Irvine (UCI). South Coast AQMD staff have been in regular discussions with the City about air monitoring data and agree that, in order to provide thorough and factual information to the community, all data should be evaluated. While one group of UCI professors evaluating data

have shared, and are willing to discuss, their results and efforts, our attempts to gain access to the Volatile Organic Compound (VOC) sensor data collected by the community group Non-Toxics Neighborhood and analyzed by other UCI professors have been unsuccessful. Since December, South Coast AQMD staff have made multiple requests for the group's data and methodologies but have been denied by both the community and their university faculty advisor.

We appreciate the City's independent request for the Non-Toxics Neighborhood data and share your frustration with their resistance to provide it. Like you, we saw references to their VOC sensor data in the recent article by The Voice of O.C. Based on the information in the article, there appear to be major limitations in terms of providing credible quantitative data that can be compared to state or federal health-based criteria. It is for this reason that we made, and continue to make, efforts to review the data and discuss measurement methods and results in order to accurately relay information about emissions and potential health impacts to the public.

As technical experts committed to protecting public health, South Coast AQMD uses the most appropriate technology, methods and approaches for each air monitoring purpose, which for this case is the evaluation of gaseous air toxics in the Irvine community. Based on the data our scientists have collected and analyzed thus far, we do not have evidence to conclude that there are elevated air toxics levels that would cause a health threat to the residents of the community near the facility. It is very concerning that the Non-Toxics Neighborhood group would create panic among residents by hiding their data from our agency, and instead providing it to the media. Their sampling program appears to use inappropriate technologies and highly uncertain methodologies to draw health conclusions. This is something we have been trying to avoid by offering our experts to work with them on the review and analysis of their data and methods. This lack of transparency, despite committing to share the information with us at our last public meeting, is disappointing.

We are in the process of organizing an air monitoring discussion among those willing and qualified to discuss this issue and to evaluate the available air monitoring data and further assess potential health risks. Of note, we continue our efforts to address the odor impacts to the community. Short-term exposure to strong foul odors can cause people to experience health symptoms such as headaches and nausea. Symptoms typically go away soon after the odors are no longer detected. The presence of foul odors does not necessarily indicate that toxic air pollutants are present at levels that would cause significant health impacts. In fact, the sampling data that we have collected to date has shown relatively typical (i.e., "background") levels of toxic air pollution in the community.

We are hoping to schedule a joint virtual community meeting with the City to update the residents on our efforts and answer community questions. We have proposed a few dates for this meeting to City staff and look forward to hearing back soon on a day that will work for the City

and South Coast AQMD. Thank you in advance for your assistance as we collectively work to address the concerns regarding emissions from AAA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne Natri', with a long horizontal flourish extending to the right.

Wayne Natri  
Executive Officer

WN/drw

cc: Irvine City Council  
Marianna Marysheva, Interim City Manager  
Pete Carmichael, Director of Community Development  
Chairman William A. Burke  
South Coast AQMD Governing Board