

GEORGE LUCIER

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**628 Redbud  
Pittsboro NC 27312  
919-542-4629  
lucierg@msn.com**

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Dear Environmental Management Committee Members

I am the Chair of Secretary's Science Advisory Board on Toxic Air Pollutants and the purpose of this letter is to express my concerns over your February 12 Air Quality Committee meeting on hydrogen sulfide. There are several issues that I would like to summarize in this letter and I would be pleased to make a short presentation on those issues at your March 12 meeting and respond to your questions then or in writing.

- 1.** I was disappointed that the major point of discussion was the SAB's risk assessment for hydrogen sulfide yet the SAB was explicitly not permitted to participate in the meeting. I was present at the meeting and would have liked to have responded to your questions concerning the risk assessment.
- 2.** Preston Howard, President of the Manufacturers and Chemical Industry Council of North Carolina (MCIC), in his lengthy presentation, told you that your responsibility was risk management not risk assessment, yet the majority of his illustrations and comments were a criticism of the SAB's risk assessment. Why was I not allowed to respond to those criticisms? His comments on the risk assessment for hydrogen sulfide were often unbalanced, misleading and/or incorrect and I would be glad to provide you with information to substantiate this statement.
- 3.** The SAB concluded, based on an extensive review of the scientific literature and consultation with several experts, that the current AAL for hydrogen sulfide poses a health risk for citizens of North Carolina. It can cause a number of adverse health effects including bronchial obstruction in asthmatics. This is clearly an adverse health effect. Since the SAB finalized their deliberations in August 2001, additional studies have been reported by the Agency for Toxic Substances Disease Registry ( a component of the CDC) showing a positive correlation between child hospital visits for respiratory diseases (including asthma) at exposure levels above 30 ppb hydrogen sulfide with a 30 minute average exposure time. Therefore, the use of this response in the derivation of a risk assessment is on a firm scientific foundation. Furthermore, it justifies the public health importance of the SAB's recommendation of a 40 ppb limit and the Division of Air Quality's decision that this response should be associated with a 1-hr averaging time.

4. Mr Overcash stated at your February 12 meeting that the SAB had said that its 23 ppb recommendation (with a 24 hr averaging time) was the most conservative choice and would protect against less sensitive endpoints. The statement that he referred to was written by the Division of Air Quality. The SAB had said simply that a 23 ppb limit was obviously more conservative than a 40 ppb limit if the same averaging times were used. The SAB had been told by the Division of Air Quality NOT to make recommendations on averaging times as this would be done by the Division of Air Quality. Therefore, Mr Overcash's statement is a misrepresentation of the SAB's recommendations. Furthermore, likely human exposure scenarios generated by the North Carolina Department of Health and Human Services indicate that the 40 ppb (1 hr averaging time) limit is the most conservative of the three risk assessments generated by the SAB.

Thank you for reading this letter and for your work on behalf of North Carolina.

Sincerely,

George Lucier, Ph.D  
Chair, Science advisory Board

Addresses:

Marion Deerhake

Anne Barnes

Daniel Besse

Delilah Banks

Will Fowler

Thomas Jenkins

Larry Jordan

Maurice Lasher

Dr. Robert Ray

Frank Shaw

Frederick Starr

cc:

SAB members

Keith Overcash

Dr. Leah Devlin