



**North Carolina Department of Health and Human Services  
Division of Public Health · Office of the State Health Director**  
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Michael F. Easley, Governor  
Carmen Hooker Odom, Secretary

Leah Devlin, DDS, MPH  
Acting State Health Director  
Director, Division of Public Health

October 7, 2002

**MEMORANDUM**

**TO:** William G. Ross Jr., Secretary  
North Carolina Department of Environment and Natural Resources

**FROM:** Leah M. Devlin, DDS, MPH, State Health Director  
North Carolina Department of Health and Human Services

**SUBJECT:** Adoption of Acceptable Ambient Levels (AALS) Recommended by the Secretary's  
Scientific Advisory Board (SAB)

This memo is written to request that the Department of Environment and Natural Resources act on the recommendations of the NC Scientific Advisory Board (SAB) to implement improved health protective standards for 20 air toxics.

Since 1990 the NC Scientific Advisory Board (SAB) has made recommendations to change or establish 24 health protective ambient levels (AALS) for air toxics (see attachment). Of these 24 recommended changes, only four AALs have been approved.

We recognize that the delays in implementation have occurred for a number of reasons including DENR's request that the SAB provide a range for these AALs; as well as the need to determine if industry costs to comply would trigger statutory mandated cost analysis. However, as a result of these delays, North Carolina citizens may be exposed to air contaminants above recommended health protective levels.

As an example, dispersion modeling conducted by the Division of Air Quality at a liquid asphalt distribution terminal in Rowan County predicted hydrogen sulfide concentrations below the current 1-hour AAL of 2,100 ug/m<sup>3</sup> but well above the new SAB recommendation of 56/ug/m<sup>3</sup>. Exposure to the hydrogen sulfide concentrations at levels reported outside the property line is associated with an increased risk of bronchial constriction in asthmatics.



We are requesting that the Department of Environment and Natural Resources (DENR) adopt the AALs recommended by the SAB as soon as possible. Because of the contamination level at the Rowan County site, we are further recommending that first priority be given to adopting the 24-hour hydrogen sulfide AAL of  $33\text{ug}/\text{m}^3$  and 1-hour AAL of  $56\text{ug}/\text{m}^3$ .

We want to offer any assistance that we might be able to provide to you or the Scientific Advisory Board in this regard. If we can be of assistance please contact Dr. Luanne Williams at 715-6429, Dr. Steve Cline at 715-6733 or Dr. Leah Devlin at 715-4177.

Thank you.

cc: Carmen Hooker Odom, Secretary, Department of Health and Human Services  
James Bernstein, Assistant Secretary, Department of Health and Human Services  
Steve Cline, DDS, MPH, Section Chief, Epidemiology Section  
Bill Pate, Acting Branch Head, Occupational and Environmental Epidemiology Branch  
Luanne Williams, Occupational and Environmental Epidemiology Branch  
Chris Hoke, Chief, Office of Legal and Regulatory Affairs

