

Copy of Comments Made by Tad Aburn<sup>1</sup>  
MWAQC Environmental Justice Subcommittee Meeting  
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Co-Chairs, MWAQC Environmental Justice Subcommittee members, thank you for providing the opportunity to provide public comment today.

My comments today focus primarily on one small piece of the proposed problem definition issue being discussed as agenda item #3 and the initial list of strategies that you will be discussing during agenda item # 4.

You will be asked to approve the proposed draft Problem Definition document. In general, the definition is good. One sentence is confusing and needs to be clarified. The last sentence in the first paragraph of the draft Problem Definition appears to place the full burden of addressing the public health risks on the community. This can not be correct. This needs to be revised to acknowledge that the actions to be taken to reduce emissions and address public health risks will come from government agencies, businesses **and** the community ... not **just the communities**.

Draft replacement language for your consideration is provided at the bottom of my written comments.

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<sup>1</sup> My name is Tad Aburn. In October of 2022, I was the Chair of MWAQC TAC. For the past 15 years I was the MDE Air Director and an MWAQC member. I have helped write and have submitted over 30 SIPs to EPA over my career. I am now retired ... doing volunteer work for overburdened communities in Prince George's County and the District of Columbia.

The issues to be discussed in agenda item # 4 ... the Master List, the Screening Criteria and the short initial list of Priority Strategies ... will not be approved today, simply discussed.

Overall these documents represent a very good start and are reasonably good. I would suggest that you use the small group of individuals that are representing different communities to refine these documents. One specific comment is that the most important set of short term strategies is not clearly included.

That strategy is based upon the fact that almost all EJ areas suffer from three, somewhat unique-to-EJ-areas, problems.

- The first major issue in EJ areas is that the number of diesel vehicles being used and releasing emissions in EJ areas is huge. Probably more than 10 to 100 times the number of trucks and emissions in EJ areas compared to the areas where you and I live. Illegal diesel truck idling is rampant. State and Local Government needs to step in immediately, focus on EJ areas ... and better enforce the law.
- Like illegal idling, the release of toxic fugitive dust is also a huge problem in EJ areas and also illegal ... much worse than in almost all other areas in the region. Fugitive dust can contain asbestos, heavy metals and other toxic compounds. Excessive emissions of fugitive dust from businesses, roadways, construction sites and warehouse parking lots is illegal throughout the DMV. Again, State and Local Government need to focus on EJ areas and stop this illegal activity.
- Finally, EJ areas are also overwhelmed by many, many businesses who emit thousands of pollutants. These businesses include large facilities like power plants, metal recycling operations, aggregate plants and asphalt plants ... and small facilities like gas stations and paint spray booths. There are so many of these sources in EJ areas that State and Local Government agencies can not ensure that all of

these sources are complying with the laws. This issue also needs to be given priority in EJ areas and fixed immediately.

Both MDE and DC DOEE have already started to do some of the enhanced inspection and enforcement efforts discussed above. It is resource intensive and most MWAQC members are already resource constrained. MDE has developed a set of enhanced enforcement tools that are much less resource intensive but still effective. MDE should brief MWAQC and MWAQC members on these “do-more-with less” tools.

It is my opinion, that if these three simple steps are taken, that the air pollution problems in EJ areas can be reduced by half. This is very, very significant.

In closing, I would again like to thank the Co-Chairs for pushing hard over the past two months. The progress that is being made is very good. It is important to remember that communities of color ... the residents ... the children ... and the elderly ... are breathing air every day that is nowhere near as clean and healthy as the air that you and I breathe. Please continue to push for action.

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[Proposed Replacement Language ... Last Sentence in first paragraph.](#)

### Current Language

There is a need for immediate and long-term government and partnership support and action to help build community awareness and help them better understand, document, and address these possible health risks.

### Replace With (Changes Highlighted)

There is a need for immediate and long-term government and partnership **action and support** to help build community awareness and **to work with them as partners** to better understand, document, and **to take action to** address these possible health risks.