

From: [Ringo, Shawn Patrick](#)
To: [Ireland, Cynthia D. \(LNI\)](#)
Subject: wildfire smoke rule draft
Date: Monday, October 10, 2022 2:09:44 PM
Attachments: [image002.png](#)

External Email

Cindy,

Please (PLEASE!) specify in Appendix A that an employer may also use an EPA “equivalent or reference method” certified PM 2.5 monitor (EQPM-1013-209) and not just those handheld monitors identified by the South Coast AQMD. We have installed these at our fixed campus locations to support evaluating PM 2.5 concentrations during wildfire smoke events.

I’m really struggling with requiring a respirator but not requiring that employees be enrolled in the respiratory protection program, as this is no longer voluntary use. If we must require a respirator, please utilize the higher 250.5 ug/m3 threshold. I’d also strongly encourage allowing for employee rotation to keep an employees time weighted average exposure below 250.5 over an hour.

The number of notification thresholds will prove very challenging for large employers with many employees working in varying locations. Please consider eliminating some of these, such as the 150 ug/m3 or even 20.5 ug/m3, with a general reminder or training that we are heading into wildfire smoke season, and where to obtain additional information. This rule is challenging to implement.

Thank you,



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