



August 29, 2018

Mr. Dave Edwards, Branch Chief **SENT BY EMAIL**
CARB
PO Box 2815
Sacramento, CA 95812

RE: Comments regarding Proposed Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting

Dear Mr. Edwards,

On behalf of the members of the Industrial Environmental Association, I appreciate this opportunity to offer additional comments on the above topic following your most recent workshop in San Diego.

Following are our suggestions:

1. Our previous comment letter noted that given that the first group of “communities” will not be formally approved until the end of September 2018, we recommended that the first year for data collection should be 2019.

However, at the most recent CARB workshop in San Diego, we learned that the proposed emissions reporting criteria will not go before the Board until the very end of 2018. Following whatever action ARB may take in December, a well planned and executed outreach, education and training effort must follow, particularly for those companies that had no previous reporting requirements. This will be essential if there is any hope for a reasonable level of compliance with the new reporting requirements. However, such a program will take a minimum of four to six months for ARB staff to conduct outreach within the 10 “communities” selected.

The proposed schedule is further complicated by the requirement to have data submitted by May 1, 2019. For years subsequent to Year 1, a May 1 due date is feasible, but not in the first year of reporting when many companies may have only learned about the requirement weeks prior.

We would recommend that ARB staff be provided a minimum of six months for notification, outreach and education on these new requirements, and that the data collection period should not begin before July 1, 2019, with the first reports due May 1, 2020.

2. The regulated community strongly believes that requiring emission inventory reports prior to May 1 of a given year is extremely onerous and should not be scheduled any earlier in the year. In addition, each District should be allowed to grant extensions when circumstances may call for it.
3. During the three years immediately following implementation of this program, there should be a defined process for looking at issues, previously unforeseen, that may call for modifications to these regulations. Regulations are usually created over years rather than months. It would be prudent to plan for the “unexpected” and establish a process whereby an annual review takes place providing opportunity for the regulated community and interested parties to present recommendations for modifications to the regulations.
4. We would also ask you to consider that there be recognition that some facilities have emissions that are de minimis in nature and are not required to be reported. Districts should have the flexibility to take into consideration air quality and related issues unique for their community.

Thank you for your consideration of these suggestions.

Best regards,

A handwritten signature in black ink that reads "Jack Monger". The signature is written in a cursive, flowing style.

Jack Monger

1330 Orange Avenue, Suite 100 • Coronado, California 92118 • (619) 522-9000
www.iea-sd.com