

15-Day Changes Workshops
**PROPOSED REGULATION FOR CRITERIA POLLUTANT
AND TOXIC AIR CONTAMINANT
EMISSIONS REPORTING**

WORKSHOP SLIDES SPEAKING NOTES

Workshop Slides and Materials:

<https://ww2.arb.ca.gov/our-work/programs/criteria-pollutant-and-toxics-emissions-reporting/meetings-workshops>

Slide 1: Title Slide

Slide 2: Rulemaking for CARB Criteria & Toxics Emissions Reporting

Good morning/afternoon, and welcome to our workshop to discuss the “15 day” updates to the Proposed Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting, or, in shorthand, “the CTR”. This workshop is a vital element in the California Air Resources Board’s regulation development process. Through this process, and through your feedback on the draft changes, we will refine and improve the CTR reporting requirements, so thank you for attending.

During 2018, following many workshops, meetings, and other outreach, we developed regulatory language for the CTR, which was provided for formal public review and comment starting in October 2018. Following a 45-day comment period, we brought the proposed regulation to our Board for consideration during December 2018.

In addition to the 18 comment letters we received during the formal 45-day comment period, we also received testimony from 17 individuals or organizations at the hearing, providing comments on the proposal. The submitted comment letters and testimony are all available on the CARB website.

Following deliberation and discussion, the Board adopted the CTR regulation. However, prior to finalizing the regulation, the Board directed staff to complete a “15-day change process,” to update the proposal based on the significant public feedback received. The updates to the regulation fall into two primary categories.

First, the Board directed staff, through the Board Resolution, to modify the applicability criteria to better satisfy public health and major air quality objectives for communities and statewide. During this presentation we will discuss our proposed applicability updates and rationale for the changes in detail.

Second, the Board directed staff to make additional changes based on comments received. Overall, these can generally be described as housekeeping updates, to minimize ambiguity and other cleanup of the regulation to address feedback on the original proposal.

The mechanism for incorporating these updates to the regulation text is through what is called a “15-day” update process. This is a formal regulatory requirement that CARB must adhere to as part of the California Administrative Procedure Act. After we receive your feedback during and after these workshops, as well as other stakeholder input, we will release a formal “Notice of Modified Text,” which will include a discussion of the proposed changes and the revised regulatory text shown. These revisions must then be provided for public comment, for a period of not less than 15 working days (which is where the 15-day update terminology comes from). We will outline the additional steps in the regulatory development process at the end of the presentation, when we discuss the next steps for moving forward.

Slide 3: Emissions Data is a Foundation of CARB's Programs

Before discussing the specific 15-day changes we are proposing to the regulation, and where we are headed, I want to take a few minutes to underscore the importance and necessity of what we are striving to accomplish with the Criteria and Toxics Reporting regulation, and why your feedback is so crucial.

Emissions inventory data is a primary foundation for our work at CARB, the local air districts, and for many others. So with your help, we are developing this new regulation. Inventory data helps us know what is being emitted into the air, by who, and where. Inventory data helps guide and provide the scientific basis for CARB's regulatory development process, to identify and address areas of concern, and to track progress in emission reduction efforts from stationary sources, area sources, and mobile sources. Inventory data is also critical for identifying the sources of toxic air contaminants to help reduce toxics risks, as required under the AB 2588 Toxics Hot Spots program.

Currently, the methods used to collect and calculate air toxics and criteria emissions vary across the state and by air district. A key goal of the draft regulation is to harmonize statewide data submission requirements, reporting deadlines, frequency of reporting, and calculation methods, so similar industrial sectors will have apples-to-apples emissions comparability, regardless of where they are located within California.

Community groups, the public, regulators, scientists, and others, have growing needs to access complete, user-friendly, and high-quality emissions data. We are committed to meeting these needs. A key element to moving forward is to modernize the existing data processes and systems for emissions inventory data quantification, collection, management, and data output for sharing information. These improvements will allow for improved access to data in user-friendly forms, such as mapping (as provided in the current CARB Pollution Mapping tool), graphs, and detailed emissions data reports when needed.

Slide 4: Current Inventories Are Inadequate For New Needs

CARB and the local air districts have spent decades developing inventories of criteria and toxics emissions for facilities throughout the state. The inventories have always had some limitations, but typically were sufficient to meet the historical needs and priorities, such as supporting State Implementation Plans and identifying and tracking some of the most significant sources of air toxics. Unfortunately, our current inventories are inadequate for meeting the modern evaluation and analysis needs of today.

For example, criteria pollutant emissions data is not collected on a consistent basis by air districts throughout the state. Some districts collect data on an annual basis, but some do not. In addition, varying emission estimation methods are used across the air districts, which makes data comparisons difficult.

For facilities that emit toxic air contaminants, in general, the air districts are only required to collect data every four years. And because of the existing requirements, data is only collected for a small subset of facilities, which leaves a large gap when evaluating the industrial sources of air toxics and their individual and combined impacts on our communities.

With the mandates of AB 617 and AB 197, significant new priorities and requirements have been established by the legislature, which CARB is responsible for implementing, in partnership with the air districts. The existing criteria and toxics emission inventory data are insufficient for meeting the community protection, public right to know, and cutting-edge analysis needs that are now required. Therefore, it is crucial to adopt a new paradigm, to make significant improvements in the completeness of emission inventory data collected, as well as how it is collected, to meet the community protection and other public health priorities for CARB and the local air districts.

Slide 5: Examples of Existing Inventory Shortcomings

The graphs on this slide are provided to illustrate some of the deficiencies I have been discussing. For reference, the graphs were produced using the CARB Pollution Mapping Tool, which provides an interactive map that displays sources of GHG, criteria pollutant, and toxics emissions. This tool is a valuable resource for community members and others to identify which sources of emissions are near where they live and work.

But, the tool is not very effective if the criteria and toxics emissions data available to include in the tool is incomplete, inconsistent, or outdated, as it is now for some sources. For example, looking at the graph for the first facility, the facility has greenhouse gas emissions (via Mandatory Reporting), for every year, shown in red. But for NO_x, there are no emissions reported for 2010 and 2011. In addition, the GHG emissions increased between 2008 and 2009, but the NO_x emissions are unchanged, so it is likely that the 2008 data was copied to 2009.

In addition, for both of these facilities, neither has any toxics emissions reported to the California statewide database. One reason for the lack of air toxics data could be that the facility at one point (perhaps over 20 years ago) reported their emissions to the AB 2588 Hot Spots program, but no longer does because they were screened out of the program based on risk.

This example shows that the Hot Spots program was not designed to support an air toxics emissions inventory because it does not sustain toxics reporting over time. Further, because toxics data are absent, it is not possible to reasonably evaluate what potential impact these facilities may have on the environment or communities.

Slide 6: Inventory Improvements Are Essential

With the CTR regulation and the proposed 15-day updates, we are establishing the requirements, and the new paradigm, for collecting the data needed to support communities, to forge ahead with ongoing air quality improvements, and to develop modern and easy-to-access data evaluation and display tools. These changes, and the regulation, are essential to make the progress that is important to so many Californians, both in disadvantaged communities and statewide.

In order to make this happen, it is vital that emissions inventory data be collected completely and consistently throughout the entire state. In addition, emissions inventory data cannot just be limited to the largest or most obvious sources that have historically been collected. Instead, it is critical to collect data from a comprehensive range of industry sectors, not only to help identify the impact of individual sources, but just as importantly, to begin the work of evaluating the cumulative toxics impacts on people from the combined effects of multiple nearby sources.

For all of these reasons, it is important to finalize, and to begin implementing, the requirements of the Criteria and Toxics Reporting Regulation.

Slide 7: Primary Regulation Elements

With that background of why we need the regulation, I will now provide a brief review of the primary regulation elements, and then discuss the 15-day changes to the regulation.

As illustrated in this slide, the regulation establishes who the regulation applies to, what facilities are required to report, and when data reporting is required.

Also, CARB staff and the local air districts will have a closely aligned partnership in implementing the requirements of the regulation. The air districts have a long history working directly with their facilities in collecting emissions data. Because of this, submitted data will continue to be collected and processed through the air districts as it is now, prior to submission to CARB.

Slide 8: Emissions Data Report Contents

As mentioned, a primary goal of the CTR is to establish statewide consistency in the emissions data that are submitted to CARB and the districts. To accomplish this, the regulation identifies which data are required to be submitted by facilities. The required data helps meet the needs of determining community-level impacts, supporting risk modeling efforts, providing completeness and clarity in the data and methods used, and allowing detailed mapping and graphing of emissions data, with tracking of increases or decreases in emissions levels.

We also have proposed reporting of specific facility location information, including where actual emissions releases occur within the facility, which are used for health risk evaluations and other analysis. Where feasible, data must also be reported for individual permitted devices or processes, to identify specific sources and for evaluating potential emissions control options.

For transparency and comparability between facilities and regions, we are also requiring that facility operators report which emission estimation methods and emission factors they use, if they are computing the emissions themselves. If the air district computes emissions based on activity, throughput, or other information, the air district will provide the method and emission factor information to CARB.

Slide 9: Overview of Most Significant Potential 15-Day Changes

Thus, we are proposing several 15-day changes to the regulation. These includes updates to the applicability to move away from the original concept of “selected community” reporting, adjustments for 2019 data reporting (as well as removing the requirement for 2018 data reporting), updates to definitions, clarifications regarding what must be included in an annual emissions data report, and other updates based on comments received.

Although there are changes within many sections of the regulation, the most significant change is to the applicability provisions, so we will begin with that, and then have a break for questions and comments afterwards.

Slide 10: Additional Applicability

This slide shows the four applicability categories established within the CTR regulation. The first three categories are the minimum applicability identified in AB 617. With the greenhouse gas, criteria pollutant, and elevated prioritization score applicability, these three categories focus on large emissions sources, and on previously identified toxics sources.

However, in order to meet the full legislative mandates of AB 617, AB 197, and other CARB and air district priorities established by statute, it is important to require reporting for "additional" facilities beyond the minimum applicability identified in AB 617.

In our initial proposal, the "additional" applicability focused strictly on AB 617 "selected communities," which would require emissions reporting from ALL sources within the selected communities. Unfortunately, this approach had flaws.

First, because "selected communities" are phased in over time, there would be uncertainty about who would be subject to reporting and when. Second, because the proposal included ALL sources, it was indiscriminate regarding which sources would be subject to reporting. Third, because it focused on selected communities, it raised questions regarding identification of specific community boundaries and buffer zones. And finally, because it only required additional reporting within selected communities, it neglected all of the other parts of the state that were not within the AB 617 selected communities.

For these reasons, during the December CARB Board meeting, based on staff input and the many comments received, the Board directed staff to develop an updated applicability mechanism to address these shortcomings, and to provide the statewide emissions inventory data needed to support CARB and the districts air quality health protection efforts into the future.

Slide 11: Additional Applicability – Guiding Principles

In developing the updated approach to applicability, we consulted extensively with stakeholders over the past months, to avoid the limitations of the initial proposal. We also developed some guiding principles, to clarify the final result we ultimately wanted to attain.

So, to mitigate the community boundary concerns, and to expand the benefits of complete emissions inventory data to the entire state, we determined that the additional applicability requirements needed to be statewide in scope, to support health-protective emission reductions for everyone in California.

Further, any requirements, or thresholds, or industry sector selections should be scientifically defensible, and ideally be based on the foundation of previous work or regulations, so we are not recreating the wheel, and end with a familiar product. For toxics emissions, when determining applicability reporting thresholds, we included adjustments for the updated and more health-protective Office of Environmental Health Hazard Assessment (or OEHHA) risk guidelines, and considered the effects of near-source and neighborhood-scale impacts in our evaluation.

It was also a priority to provide easy to understand applicability thresholds, such as gallons of fuel used, or gallons of coatings used, so businesses would not need to perform complex calculations to determine if they are subject to the reporting regulation. And finally, it was important to create mechanisms to phase-in the reporting requirements over multiple years to help balance and minimize resource impacts on affected businesses, air districts, and CARB. The upcoming slides will discuss all of this in detail.

Slide 12: Additional Applicability – Overview

To begin, under the draft additional applicability requirements, instead of only including AB-617 selected communities, the applicability based on criteria pollutant and toxics emitting facilities would be expanded statewide. As previously discussed, this provides benefits to the entire state, and not to just selected communities. In order to collect the most complete and accurate data, the applicability requirements are focused on those sources that are permitted by the local air quality management districts. Through future efforts, if significant sources are identified that are not permitted, then we would ensure that those sources are inventoried in the future.

For the statewide applicability, the first overarching reporting threshold is based on criteria pollutant emissions. Any facility in California with an air district permit to emit more than four tons per year of any individual criteria pollutant, would be required to submit an annual emissions report quantifying their criteria and toxic emissions. As a refresher, criteria pollutants include oxides of nitrogen, volatile organic compounds, particulate matter, carbon monoxide, ammonia, lead, and sulfur dioxide.

Next, as a second category, we have established a toxic pollutant threshold applicability for specific industry sectors or activities that are known to produce toxic emissions. I will provide more detail, but in summary, certain permitted industry sectors are required to submit emissions data reports regardless of emissions. This type of “no threshold” applicability would apply to sources such as metal plating and hazardous waste facilities, which are clearly known sources of concern for toxics emissions, regardless of the level of activity at the facility.

We have also specified a second group of sectors that must report if a throughput or use threshold is exceeded, such as gallons of fuel used. Some of the types of activities in this threshold-based category include permitted backup diesel engines, retail gas stations, auto paint and body shops, and commercial cooking and charbroiling.

Slide 13: Additional Applicability – Air Toxics

The new toxics-based applicability, focuses emission inventory efforts on sources of most concern, and avoids the fragmented approach of the initial proposal. Nevertheless, as proposed, over the course of the implementation roll-out covering the next five to six years, we estimate that around fifty-thousand additional sources would be subject to reporting out of a universe of about seventy to eighty-thousand permitted sources. Because this is a substantial number of sources, we are proposing a phased-in approach for the toxics facilities.

To do this, we began with the toxics emissions reporting thresholds established within the longstanding AB-twenty-five-eighty-eight Air Toxics “Hot Spots” program. This provided a pre-existing science-based framework and baseline for the reporting thresholds.

In terms of managing the workload under the applicability requirements, we evaluated all the sectors and activities proposed to be included for toxics (there are more than 35 in the draft), and identified which sources should be included during the first years of reporting, and which could be incorporated during later years. This phasing approach is based on an evaluation of which sources tend to be significant for toxic emissions risk, and of course, those are included in the earliest years of the program.

In addition, because the regulation would require emissions data from thousands of retail gasoline stations and facilities with diesel backup engines, and their emissions are generally straightforward to compute based on simple parameters, within the regulation we have proposed simplifications in what they must report, which I will discuss more completely later in the presentation. We may consider similar simplifications for other categories in future rulemakings.

As mentioned, the pre-existing Hot Spots toxics thresholds and sectors were used as a starting point for establishing applicability. But, as mentioned in the previous Guiding Principles slide, we also included adjustments to take into account the updated 2015 OEHHA risk guidelines, which more completely incorporate childhood and full lifetime exposure risks to toxics, so they are therefore more health-protective. We also made adjustments to thresholds and sectors to account for emerging chemicals being used, as well as persistent or bioaccumulative chemicals. Then, we did additional fine-tuning to consider the potential toxic exposure impacts from combined or clustered facilities.

As you may guess, this has been a substantial undertaking over the past two months. We are satisfied with the current result, which focuses the inventory efforts on the most significant sources, and provides certainty for businesses and the air districts regarding which facilities are subject to reporting.

Slide 14: Additional Applicability – Air Toxics (cont.)

The list on this slide illustrates the multiple sources under consideration for the proposed toxics applicability criteria. For the items shown in blue, we have identified those as “no threshold” sectors or activities, which means that they would be subject to annual reporting of criteria and toxics emissions from permitted activities. These sectors are “no threshold” because there is no definitive overall “safe” level for the toxics emissions from these sectors under potential exposure scenarios.

The other activities, shown in black, have specific applicability thresholds identified in the proposed 15-day changes. For example, for Tier 4 diesel engines, the proposed reporting threshold is, over 100 gallons of fuel combusted per year or over 5 hours per year of operation. For painting and auto body shops, the threshold is, over 30 gallons of paint used per year. There are similar thresholds for styrene emissions, methylene chloride use, ethylene oxide use, and so on. Each of these sectors and the associated thresholds were established to be health protective, but do not require reporting from every single facility within California.

The approach is to phase in sectors over time, and not require all of them to be subject to reporting all at once. So for example, possibly one-third of the sectors would be brought in for year one, then the next third of the sources would report in year two, and the final third in year three. We are considering several options and are open to suggestions.

Slide 15: Additional Applicability Criteria – Schedule (1)

As discussed previously, the 15-day changes include phasing-in the requirements both by region, and by industry sector. We are seeking input on our initial concept. As currently proposed, the air districts are split into two groups, with Group A including the large and medium air districts, and Group B including rural and mountain air districts. The first grouping includes all of the air districts which have Year-One AB-617 selected communities, as well as the medium sized districts. This group includes the vast majority of facilities within the state that would ultimately be subject to reporting.

We haven't identified an initial start year for the "additional" applicability requirements in the text, but we have discussed the feasibility of starting with 2020 data reported in 2021, or 2021 data reported in 2022, consistent with the original timing for the community boundary approach. During the initial starting year, once it is established, the facilities with emissions greater than four tons per year of criteria pollutants would be subject to reporting, as well as the first "Phase" of toxic industry sectors.

Slide 16: Additional Applicability Criteria – Schedule (2)

This slide illustrates one possible phase-in scenario. In the initial year the “A” districts would report sources in Sector Phase 1, and then the other sector phases are required to report over time. The “B” districts would follow a similar schedule, but delayed by one year.

Then, additional non-emissions data, such as stack parameters or emissions release data, would also be further staggered, such that a facility subject to reporting in Year 1 would not be required to report this additional data until Year 3. For additional detail regarding possible district and sector groupings, see Tables A-2 and A-3 of the preliminary draft 15-day regulation text.

This approach is provided to balance workload and resources. We understand that this approach would be a substantial undertaking. Implementing the requirements may require outreach to the facilities, data collection, data quality assurance, and data management, but we believe that the efforts are justified by the benefits.

BREAK for Comments: Additional Applicability

We would now like to take some time for comments or questions regarding the proposed additional applicability provisions.

Slide 17: Other Proposed 15-Day Updates (1)

The applicability requirements we have been discussing are the most substantial updates to the regulation, but we have included additional updates to improve the regulation based on comments we have received.

The first of these changes is to remove the requirement to report 2018 data in 2019. With the timing of the regulation development process, it is not realistic to require reporting 2018 data because the regulation will not be in effect before the May 1 reporting deadline.

Also, to ease the transition into the reporting program, the first year of data reporting, which as proposed is 2019 data reported in 2020, will be “business as usual.” This means that for the first three applicability categories, facilities subject to the regulation will report the same inventory data they are presently reporting to their air district, using currently existing methods. If a facility has not been submitting annual updates to their district, then it will need to start with the 2019 data. Note that this timing only applies the AB 617 minimum applicability categories for greenhouse gas, criteria emissions, and elevated toxics, and not the additional applicability requirements, which would be on a different time-line.

Then, beginning with 2020 data submitted in 2021, the full data reporting requirements must be met, which means providing full facility location information, NAICS codes, device and process information, all applicable toxics emissions, and other data.

For the natural gas distribution sector, we clarified the exemption requirements, and clarified the reporting requirements for onshore petroleum and natural gas production, for consistency with existing district reporting practices. We also modified the definition of particulate matter and the PM applicability criteria, to clarify that permitted filterable and condensable PM are included in the applicability requirements and are to be included in reporting.

Slide 18: Other Proposed 15-Day Updates (2)

Within the regulation, we modified several of the definitions to address comments received, including the definitions for “Activity level,” “Best available data and methods,” and “Primary emissions release location.” We would appreciate your feedback on these, or any, of the definition updates. We also added several definitions, primarily related to the data reporting requirements. In the initial draft, we had not defined some terms, and in some cases, we added data fields requiring new definitions. For example, we added definitions for “Pollutant code” which provides the numeric ID for criteria pollutants, “Standard industrial classification code,” which is a historical code used to classify a facilities primary business. You can review all of the updates in section 93402 of the regulation.

As you look at the draft, you will see multiple minor additional updates throughout the text. These are generally small tweaks and cleanup to make the requirements and intent clearer. However, a more significant change is the inclusion of the “abbreviated” reporting provisions in sections 93403(b) and 93404(c). These provisions would only apply to backup generators and retail gasoline stations, and provide streamlined reporting requirements, as well as the option for the air districts to perform the emission estimates for facilities. This “abbreviated” option is provided for these two source types because the emissions are typically straightforward to estimate, and there are thousands of them. By providing an abbreviated option, we reduce the impact of the regulation on these facilities, by making emissions data reporting more efficient and less costly for these sources. We would appreciate your feedback on this approach.

Slide 19: Other Proposed 15-Day Updates (3)

This is the final slide on the draft 15-day updates. These changes apply to the reporting requirements in section 93404, which describes the data that must be submitted in an annual emissions report. As with all of the proposed updates, these revisions are based on the comment letters we received during the initial 45-day comment period, the testimony presented at the Board meeting, direction provided by the CARB Board, and ongoing discussions with the air districts, environmental advocates, and industry representatives.

One change you will see to the Emissions Report Contents section is that parts of the section have been reorganized, to create a more logical flow, as with the emissions release location data. We also divided the release location data into separate “stack” and “fugitive” categories to make it easier to specify distinct reporting requirements for each release type. As mentioned previously, we also added a requirement to report the facility Standard Industrial Classification (or SIC) code. Although these historical codes are no longer updated and supported, they are still widely used and are needed to support existing legacy systems.

We revised the text in section 93404(d) regarding “Emissions” to make it clearer that emissions from unpermitted sources are required to be reported, but only if they are currently inventoried by the air district. The rationale is that if the district already requires the data to be quantified and submitted, then it makes sense to collect it as part of the reporting requirements. But, the regulation does not require emissions reporting from sources that are not permitted and are not currently inventoried by the district.

In the draft 15-day changes, we also split out the reporting requirements for portable equipment into its own subsection in 93404(d)(4) to make the requirements clearer. The basic requirements are unchanged, in that portable equipment still must be reported unless it is registered under the CARB Portable Equipment Registration (or PERP) Program. However, we have included a provision in which CARB or an air district may require emissions reporting for PERP equipment. Reporting may be required if there is good cause to expect that the routine and predictable emissions from the portable diesel engines used at the facility have the potential to pose a significant risk. This provision was added to address situations in which significant ongoing portable equipment use is occurring, such as during major facility workovers, in which portable diesel engines may be used extensively on a scheduled and predictable basis. In these situations, the emissions from the equipment could pose health risks, which is why we have included the option to require reporting of this equipment.

As you look at section 93404, you will see a variety of other changes. Some of the terminology has been updated, and we have added some fields such as District Permit ID, Design Capacity of combustion devices, and if the facility is subject to Title Five requirements. Because of all of the comments received on the initial 45-day version of the regulation (thank you for those), in this 15-day draft we have been able to make substantial improvements to the reporting requirements and the regulation overall.

Slide 20: Seeking Input and Questions

We're now going to open it up for comments or questions on the draft text. Following that, we'll summarize the process for moving ahead in the coming months for finalizing the regulation.

We would appreciate your input on any of the topics shown: Applicability, phase-in approaches, sectors to include, the definitions, the reporting requirements, data to submitted, and anything else you would like to talk about.

Slide 21: Ongoing 15-Day Regulation Development

As mentioned, the CARB Board adopted the proposed regulation in December, but directed staff to make additional specific modifications prior to finalizing the regulation, including modification to the applicability requirements to best satisfy CARB and air district public health and air quality objectives, as well as other updates to the requirements. Following that Board direction, what we presented today are our draft 15-day changes for your consideration.

Next we will take the input we receive during and after the workshops, combined with our work and coordination with the air districts and stakeholders, to update the proposal. If you do have comments, please submit them by March 29th, so we have time to incorporate your suggestions. You can submit comments to our program email address at: [ctr \[dash\] report@arb.ca.gov](mailto:ctr_report@arb.ca.gov) (CTR-Report@arb.ca.gov)

Note that comments submitted during this time are considered “informal” comments, and will not be part of the official rulemaking record. But, as with prior workshop comments received, we plan post them to our program website.

Once we have incorporated all of your comments into the regulation, we will prepare an official 15-day rulemaking version of the updated proposed regulation. This version will be released during the spring, along with a “Notice of Public Availability of Modified Text.” The notice will describe the revisions made to the regulation and provide the dates in which “formal” comments on the regulation must be submitted to be included in the official rulemaking record. Typically, 15 working days are provided for comment (hence the 15-day changes), but depending on the 15-day updates incorporated, we may consider extending the comment period to allow additional review time.

Because some of the updates are fairly complex, we expect that it will be necessary to have a second 15-day comment period in early summer, to complete any final refinements, based on the formal 15-day comments received. We will then complete the revisions, prepare the documents required under the rulemaking process, and submit them to the California Office of Administrative Law. We expect that the regulation will be fully approved and effective on January 1, 2020, and then the first reporting will be for 2019 data in 2020, using “business as usual” data for the first reporting year.

Question Break (if needed): Are there any questions on the process moving forward?

Slide 22: Ongoing Program Activities – Uniform Methods

So that completes the discussion of the regulation revisions, but before closing, I want to give you an update on what’s happening on a longer timescale to improve the emissions inventory data. AB 617 requires CARB to establish, in consultation with districts, a uniform statewide system of annual reporting of emissions data.

To create this uniformity, CARB staff will work with the air districts and others, to develop uniform emission estimation methods for primary industry sectors, which will allow direct comparisons between similar sources throughout the state. In addition, we will coordinate with the air districts, engage with industry, academia, and other interested parties to ensure the methods are relevant and up-to-date. Staff plan to develop the methods using a sector-by-sector approach. Two of the first sectors we will focus on are refineries and power plants.

Also, because the regulation is new, and ongoing enhancements are expected, we are planning on having a series of updates to the regulation in the coming years, after this initial version is finalized and adopted.

Slide 23: Contact Us – Reporting Regulation

To wrap up, this slide has a link to our current website and our program email address. Also, please subscribe to our listserve, to receive bulletins about workshops, workgroups, availability of materials, and other information as we move forward. There is a direct subscription link on our website too.

Slide 24: Contact Us – Reporting: Key Staff

Thank you all for attending. We appreciate your attendance and the help in crafting the CTR. This pioneering regulation establishes the foundation for providing a comprehensive emission inventory framework, creating new possibilities for making concrete improvements in air pollution, and future health benefits for those affected by air pollution in California.

Please don't hesitate to contact us with questions, concerns, or other feedback, using the contact information here, or using our general program email address on the previous slide. Thank you.

Slide 25: END