

September 29, 2020

Mr. Gabe Ruiz
Manager, Toxics Inventory and Special Projects Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814
E-mail: ab2588ei@arb.ca.gov

Dear Mr. Ruiz:

On behalf of the California Cement Manufacturers Environmental Coalition, we would like to thank you and other CARB staff members for accommodating a continuing dialogue to resolve the cement industry's concerns with proposed revisions to the AB 2588 reporting regulations.

Our industry's historical goal has been to work closely with CARB in the development of policies that are workable to both CARB's objectives and the cement industry's ability to effectively and efficiently comply with those objectives. In this letter, we are taking the informal comments provided earlier to CARB staff in various meetings and emails and presenting these as formal comments submitted as a public comment letter to the appropriate CARB email address. Upon your internal review of the concepts provided in this correspondence, CCMEC looks forward to further conversations with CARB in the EICG rule development process pertinent to the Portland Cement manufacturing industry.

In this letter, we are presenting three rule language change items for CARB's consideration.

- First, the language change to Appendix C referenced in Section VIII (see bolded language of insert to Section VIII), which is proposed to be modified in agreement with the letter issued on September 14 (see Attachment 1 and Attachment 4);
- Second, another language change, this time to Section II, to be consistent with the Section VIII change and the CCMEC letter (see Attachment 2); and
- Third, a request to change the effective date of certain chemicals for which the justification is as follows (see Attachment 3):

For Table 1, we started with the Appendix A list for the chemical groups identified in Appendix C for cement and uploaded them into an Excel sheet, then showed columns for the effective date assigned by CARB (second to last column) and for the effective date as proposed by CCMEC (last column). In this manner, we are presenting the request for effective dates to be changed as shown (all chemicals are listed in the table, but effective dates are only proposed to be changed for some of the chemicals).

REASONS FOR REQUESTING EFFECTIVE DATE CHANGES

Effective dates are proposed to be changed from e or ExistGrp to ChemSet1, or from ChemSet1 to ChemSet 2, as shown in Table 1, for one of the following reasons:

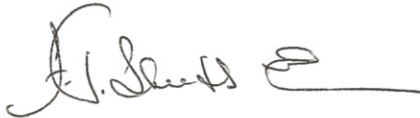
- A. Although listed in existing Appendix A (and previously included in Appendix C category listed), chemical was not addressed previously because of one or more of the following: no toxicity data available, no source test method available, obscure chemical previously viewed as irrelevant.
- B. Although listed in existing Appendix A, this chemical was not previously included in the Appendix C listing, and hence was not previously connected by CARB to cement manufacturing.
- C. In some cases, a group was divided up by CARB with some chemicals in the same group assigned by CARB to ChemSet1 and others to ChemSet2. We moved all chemicals in the same group (previously split between ChemSet1 and ChemSet2) to ChemSet2.

CONCLUSION

CCMEC appreciates the opportunity to comment on CARB's amended AB 2588 Emission Inventory and Criteria Guidelines (EICG) dated July 28, 2020 and looks forward to our next discussion with CARB to address the cement industry concerns.

For questions and/or concerns please feel free to contact me at your convenience.

Sincerely,



Frank T. Sheets
CCMEC Chairman
(909) 972-5735
FSheets@StrategicPartnersGroup.org

cc: Mr. Richard Corey, California Air Resources Board
Mr. David Edwards, California Air Resources Board
Mr. Greg Harris, California Air Resources Board

Enclosures:

- 1. Attachment 1 – EICG Regulation Appendix C Excerpt Modified
- 2. Attachment 2 – EICG Further Language Change Requested
- 3. Attachment 3 – Group Lists Table
- 4. Attachment 4 – Copy of Letter Submitted to CARB Dated September 14, 2020

Attachment 1 – EICG Regulation Appendix C Excerpt Modified

C. Specifications for Identifying Emission Points and Substances Emitted.

- (1) The facility operator shall identify and report in the emission inventory plan and the emission inventory report as a distinct emitting process or device each occurrence within the facility of the emitting processes and devices set forth in Appendices C-I and C-II (the Facility Guidelines Index, herein referred to as the "Facility Look-up Table"), and shall determine whether any listed substance is present, including but not limited to those indicated in Appendices C-I and C-II.
- (2) For the devices, emitting processes, and fugitive sources set forth for all facility classes in Appendix C-I and for the applicable facility class(es) set forth in Appendix C-II, the operator shall report all emissions of substances listed in Appendix A-I, and shall report the production, use, or other presence of substances listed in Appendix A-II. The operator shall also report the production, use, or presence of substances listed in Appendix A-III if the substance is manufactured by the facility and is released to the air.
- (3) The facility operator shall use and cite available technical guidance as needed to identify the presence of any listed substances and to quantify and report emissions in accordance with the requirements set forth in section VIII.E.
- (4) Nothing in sections VIII.C.(1) through (3), shall be construed as requiring that source testing be conducted for substances set forth in Appendix C. Further, in cases where a substance set forth in Appendix C is not in fact present at a particular facility, the facility operator shall not attempt to quantify the emissions of such substance, but shall provide adequate documentation to demonstrate to the district that the possible presence of the substance at the facility has been addressed and that there are no emissions of the substance for specified reasons.
- (5) **When implementing the suggested chemical list by source category in the following Appendix C tables (as this list becomes applicable on the rule effective date), facilities will begin a chemical evaluation process as follows. Facilities will begin by evaluating qualitatively whether the chemical applies to the source category. The qualitative analysis could be based on process knowledge, engineering judgment, or lab analyses. If the chemical does apply, facilities will assess whether there is an EPA or ARB published source test method available for this chemical. If there is a published source test method available, the facility will perform source testing for the chemical. In case of source test results with non-detect values, facilities will follow ARB guidance on the procedure for addressing non-detect values and whether the chemical can be considered "not detected".**

If the chemical does not apply to the source category, if there is no EPA or ARB published source test method available, or if the chemical can be considered "not detected" after source testing is performed, the chemical will not be reported under the ARB CTR rule and will not be included in prioritization score or health risk assessment calculations.

For new chemicals added to the Appendix C list as of the rule effective date, the chemical evaluation and source testing (where applicable) will be completed based on the schedule in the rule. For new chemicals added to Appendix C after the rule effective date, the new chemical will be addressed within two calendar years of the

end of the calendar year where the new chemical listing occurs. For new source test methods published by EPA or ARB after the rule effective date, the new source test methods will be incorporated within two calendar years of the end of the calendar year where the new source test method is published.

The above requirements also pertain to Appendix A chemical listings, where found to be applicable to a particular source category, but not included in the Appendix C list.

D. Exempted Uses.

The following uses of listed substances shall not be subject to this regulation:

- (1) Use as a structural component of the facility.
- (2) Personal use by employees or other persons of foods, drugs, cosmetics, tobacco products, and other personal items, including supplies of such products within the facility in an on-site cafeteria, store, or infirmary.
- (3) Office and administrative use of products including ink, marking pens, ink pads, correction fluid, correction fluid thinner, and glue.
- (4) Use of products for routine janitorial or facility grounds maintenance.
- (5) Use of products for structural maintenance and repair, including WD-40 and other lubricants, sealants, touch-up paints, spray paints, and varnishes. Structural maintenance does not include maintenance and repair of process and industrial equipment.

Attachment 2 – EICG Further Language Change Requested

AB2588 EICG language changes requested by CCMEC, Sept. 15, 2020:

Changes needed to Section II, H (4), presented below with requested changes (BOLD items are inserts):

(4) Availability of Emission Quantification Methods

If no emission quantification method exists to quantify emissions of a substance at the time of its "Effective Phase", the facility operator only needs to report the presence of the substance [removed section about use or production and form S-UP-Q].

The presence of the substance will be evaluated as follows:

- **Step 1--Evaluate whether the new chemical applies to cement: If there is no specific basis for thinking that the chemical applies to cement, the chemical will be eliminated from further consideration. For chemicals that apply to cement, proceed to Step 2.**
- **Step 2—Identify the source test method for the chemical group that the new chemical falls in and the analytes covered by that source test method: If the chemical is not listed as an analyte in a standard EPA or ARB published source test method, the chemical will not be reported. For chemicals that have a standard EPA or ARB published source test method, proceed to Step 3.**
- **Step 3—Perform testing on the new chemical: If the chemical is not detected in source testing (per the procedure for handling non-detect values, to be agreed upon at a later time), the chemical will not be reported. For chemicals detected, these will be reported.**

The availability of an emission quantification method shall be re-evaluated **for chemicals not eliminated in Step 1 above**, at the time of the next facility update reporting cycle. **If a standard published EPA or ARB source test method (where the chemical is listed as an analyte in that method) is available one calendar year or more before the next facility update reporting cycle**, emission quantification is required pursuant to the provisions in section VIII.E.(3).

Attachment 3 – Group Lists Table

Proposed Effective Date Changes by Chemical Groups

Group	Total Number of Chemicals	Number of Chemicals with Proposed Effective Date Change
PAHs	63	20
PAHRs	40	19
POMs	36	35
Fibrous Materials	16	14
Other Chemicals (miscellaneous)	4	2
PCDD/PCDFs and PCBs	43	0
Volatile Organics (excluding aldehydes)	2	0
Aldehydes	1	0
Inorganics (Cl ₂ , HCl)	2	0
Metals (including metal compounds)	22	0
Total	229	90

These chemicals were determined by reviewing Appendix C of the proposed regulation and cross-referencing the entries with Appendix A of the proposed regulation. The Appendix C sections reviewed were the entries for "Industry/Emitting Process Level 2: Cement Manufacturing". An excerpt with these sections is provided on the last page of this document.

Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
PAHs

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	PAH-A	Acenaphthene [PAH, POM]	Existing	CARB 429	e	e
2	PAH-A	Acenaphthylene [Cyclopenta[cd]anthracene] [PAH, POM]	Existing	CARB 429	e	e
3	PAH-A	Anthracene [PAH, POM]	Existing	CARB 429	e	e
4	PAH-A	Benz[ajanthracene] [PAH, POM]	Existing	CARB 429	e	e
5	PAH-A	Benzo[b]fluoranthene [PAH, POM]	Existing	CARB 429	e	e
6	PAH-A	Benzo[k]fluoranthene [PAH, POM]	Existing	CARB 429	e	e
7	PAH-A	Benzo[ghi]perylene [PAH, POM]	Existing	CARB 429	e	e
8	PAH-A	Benzo[a]pyrene [PAH, POM]	Existing	CARB 429	e	e
9	PAH-A	Benzo[e]pyrene [PAH, POM]	Existing	CARB 429	e	e
10	PAH-A	Chrysene [PAH, POM]	Existing	CARB 429	e	e
11	PAH-A	Dibenz[ah]anthracene [PAH, POM]	Existing	CARB 429	e	e
12	PAH-A	Fluoranthene [PAH, POM]	Existing	CARB 429	e	e
13	PAH-A	Fluorene [PAH, POM]	Existing	CARB 429	e	e
14	PAH-A	Indeno[1,2,3-cd]pyrene [PAH, POM]	Existing	CARB 429	e	e
15	PAH-A	Naphthalene [PAH, POM]	Existing	CARB 429	e	e
16	PAH-A	Perylene [PAH, POM]	Existing	CARB 429	e	e
17	PAH-A	Phenanthrene [PAH, POM]	Existing	CARB 429	e	e
18	PAH-A	Pyrene [PAH, POM]	Existing	CARB 429	e	e
19	PAH-A	2-Methyl-naphthalene 2-Methyl-naphthalene [Methyl-PAH, POM]	Existing	CARB 429	e	e
20	PAH-A	PAHs, total, w/o individ. components reported [PAH, POM]	Existing	CARB 429	e	e
21	PAH-A	PAHs, total, with individ. components also reported [PAH, POM]	Existing	CARB 429	e	e
22	PAH-A	7,12-Dimethylbenz[ajanthracene] [Methyl-PAH-Derivative, POM] (see PAH, Methyl-PAH)	Existing	CARB 429	e	e
23	PAH-A	3-Methylcholanthrene [Methyl-PAH-Derivative, POM] (see PAH, Methyl-PAH)	Existing	No	e	ChemSet-1
24	PAH-A	5-Methylchrysene [Methyl-PAH-Derivative, POM] (see PAH, Methyl-PAH)	Existing	No	e	ChemSet-1
25	PAH-A	Benzo[j]fluoranthene [PAH, POM]	Existing	No	e	ChemSet-1
26	PAH-A	Dibenzo[ah]pyrene [PAH, POM]	Existing	No	e	ChemSet-1
27	PAH-A	Dibenzo[ghi]perylene [PAH, POM]	Existing	No	e	ChemSet-1
28	PAH-A	Dibenzo[ah]pyrene [PAH, POM]	Existing	No	e	ChemSet-1
29	PAH-A	Dibenzo[ah]pyrene [PAH, POM]	Existing	No	e	ChemSet-1

Notes from ARE Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
PAHs

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
30	PAH-B1	Benzo[a]fluoranthene [PAH, POM]	New	No	ChemSet-1	ChemSet-2
31	PAH-B1	Benzo[ghi]fluoranthene [PAH, POM]	New	No	ChemSet-1	ChemSet-2
32	PAH-B1	Methylanthracene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
33	PAH-B1	2-Methylanthracene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
34	PAH-B1	9-Methylanthracene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
35	PAH-B1	12-Methylbenz(a)anthracene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
36	PAH-B1	Methylbenzopyrene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
37	PAH-B1	Methylchrysene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
38	PAH-B1	3-Methylchrysene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
39	PAH-B1	1-Methylphenanthrene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
40	PAH-B1	1-Methylphenanthrene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
41	PAH-B1	1-Methylpyrene [Methyl-PAH, POM]	New	No	ChemSet-1	ChemSet-2
42	PAH-B2	Anthracene [Dibenzo[cd]k]pyrene] [PAH, POM]	New	No	ChemSet-2	ChemSet-2
43	PAH-B2	Benzo[j]aceanthrylene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
44	PAH-B2	Benzo[b]chrysene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
45	PAH-B2	Benzo[c]fluorene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
46	PAH-B2	Benzo[c]phenanthrene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
47	PAH-B2	Coronene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
48	PAH-B2	Dibenz[a,c]anthracene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
49	PAH-B2	Dibenz[a,j]anthracene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
50	PAH-B2	Dibenzo[e]pyrene [PAH, POM]	New	No	ChemSet-2	ChemSet-2
51	PAH-B2	1,2-Dimethylnaphthalene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
52	PAH-B2	1,6-Dimethylnaphthalene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
53	PAH-B2	2,6-Dimethylnaphthalene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
54	PAH-B2	1,7-Dimethylphenanthrene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
55	PAH-B2	6-Methylchrysene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
56	PAH-B2	1-Methylfluoranthene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
57	PAH-B2	3-Methylfluoranthene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
58	PAH-B2	2-Methylphenanthrene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
59	PAH-B2	3-Methylphenanthrene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
60	PAH-B2	9-Methylphenanthrene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
61	PAH-B2	4-Methylpyrene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
62	PAH-B2	Retene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2
63	PAH-B2	2,3,5-Trimethylnaphthalene [Methyl-PAH, POM]	New	No	ChemSet-2	ChemSet-2

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
PAHRs

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	PAHR-A	2-Acetylaminofluorene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
2	PAHR-A	2-Aminoanthraquinone [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
3	PAHR-A	Direct Black 38 [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
4	PAHR-A	Direct Blue 6 [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
5	PAHR-A	Carbaryl [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
6	PAHR-A	1,6-Dinitropyrene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
7	PAHR-A	1,8-Dinitropyrene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
8	PAHR-A	5-Nitroacenaphthene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
9	PAHR-A	6-Nitrochrysene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
10	PAHR-A	2-Nitrofluorene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
11	PAHR-A	1-Nitropyrene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1
12	PAHR-A	4-Nitropyrene [PAH-Derivative/Related, POM]	Existing	No	e	ChemSet-1

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
PAHRs

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
13	PAHR-B1	1-Amino-2,4-dibromanthraquinone [PAH-Derivative/Related, POM]	New	No	ChemSet-1	ChemSet-2
14	PAHR-B1	2-Aminofluorene [PAH-Derivative/Related, POM]	New	No	ChemSet-1	ChemSet-2
15	PAHR-B1	Anthraquinone [PAH-Derivative/Related, POM]	New	No	ChemSet-1	ChemSet-2
16	PAHR-B1	C.I. Direct Blue 218 [PAH-Derivative/Related, POM]	New	No	ChemSet-1	ChemSet-2
17	PAHR-B1	Carbazole [PAH-Derivative/Related, POM]	New	No	ChemSet-1	ChemSet-2
18	PAHR-B1	2-Chloronaphthalene [PAH-Derivative/Related, POM]	New	No	ChemSet-1	ChemSet-2
19	PAHR-B1	3-Nitrobenzanthrone [PAH-Derivative/Related, POM]	New	No	ChemSet-1	ChemSet-2
20	PAHR-B2	Benz[<i>a</i>]anthracene-7,12-dione [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
21	PAHR-B2	Benzo[<i>a</i>]anthrone [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
22	PAHR-B2	3,7-Dinitrofluoranthene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
23	PAHR-B2	3,9-Dinitrofluoranthene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
24	PAHR-B2	1,3-Dinitropyrene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
25	PAHR-B2	Fluorenone [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
26	PAHR-B2	Methylanthralene (mixed) [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
27	PAHR-B2	1-Naphthaldehyde [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
28	PAHR-B2	1,5-Naphthalenediamine [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
29	PAHR-B2	2-Nitroanthracene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
30	PAHR-B2	7-Nitrobenz[<i>a</i>]anthracene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
31	PAHR-B2	6-Nitrobenzo[<i>a</i>]pyrene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
32	PAHR-B2	3-Nitrofluoranthene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
33	PAHR-B2	1-Nitronaphthalene (Nitrol) [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
34	PAHR-B2	2-Nitronaphthalene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
35	PAHR-B2	3-Nitroperylene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
36	PAHR-B2	3-Nitrophenanthrene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
37	PAHR-B2	9-Nitrophenanthrene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
38	PAHR-B2	2-Nitropyrene [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
39	PAHR-B2	9-Phenanthrenecarboxaldehyde [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2
40	PAHR-B2	Xanthone [PAH-Derivative/Related, POM]	New	No	ChemSet-2	ChemSet-2

Notes from ARB Appendix A:

ChemSet-1 is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 ChemSet-2 is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
POM

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	POM-A	Dibenzofuran [POM]	Existing	No	e	ChemSet-1
2	POM-A	4-Aminobiphenyl [POM]	Existing	No	e	ChemSet-1
3	POM-A	Benzidine (and its salts) [POM]	Existing	No	e	ChemSet-1
4	POM-A	Benzidine-based dyes [POM] including but not limited to:	Existing	No	e	ChemSet-1
5	POM-A	Direct Brown 95 (technical grade) [POM]	Existing	No	e	ChemSet-1
6	POM-A	Biphenyl [POM]	Existing	No	e	ChemSet-1
7	POM-A	Chlorobenzilate [POM] (Ethyl-4,4'-dichlorobenzilate)	Existing	No	e	ChemSet-1
8	POM-A	DDT (1,1,1-Trichloro-2,2-bis(p-chlorophenyl)ethane) (Clofenotane) [POM]	New	No	e	ChemSet-1
9	POM-A	Dibenz[a,h]acridine [POM]	Existing	No	e	ChemSet-1
10	POM-A	Dibenz[a,j]acridine [POM]	Existing	No	e	ChemSet-1
11	POM-A	3,3'-Dichlorobenzidine [POM]	Existing	No	e	ChemSet-1
12	POM-A	Dichlorodiphenylchloroethylene (DDE) [POM]	Existing	No	e	ChemSet-1
13	POM-A	Dicofol [POM]	Existing	No	e	ChemSet-1
14	POM-A	3,3'-Dimethoxybenzidine [POM]	Existing	No	e	ChemSet-1
15	POM-A	4-Dimethylaminoazobenzene [POM]	Existing	No	e	ChemSet-1
16	POM-A	3,3'-Dimethylbenzidine (o-Tolidine) [POM]	Existing	No	e	ChemSet-1
17	POM-A	Diphenylhydantoin [POM]	Existing	No	e	ChemSet-1
18	POM-A	1,2-Diphenylhydrazine (Hydrazobenzene) [POM]	Existing	No	e	ChemSet-1
19	POM-A	Methylene diphenyl diisocyanate (MDI) [POM]	Existing	No	e	ChemSet-1
20	POM-A	4,4'-isopropylidenediphenol [POM] (BPA) (see Bisphenol A)	Existing	No	e	ChemSet-1
21	POM-A	Methoxychlor [POM]	Existing	No	e	ChemSet-1
22	POM-A	4,4'-Methylene bis(2-chloroaniline) (MOCA) [POM]	Existing	No	e	ChemSet-1
23	POM-A	4,4'-Methylenedianiline (end-to-dielectric) [POM] (MDA)	Existing	No	e	ChemSet-1
24	POM-A	Michler's ketone [POM]	Existing	No	e	ChemSet-1
25	POM-A	4-Nitrobiphenyl [POM]	Existing	No	e	ChemSet-1
26	POM-A	N-Nitrosodiphenylamine [POM]	Existing	No	e	ChemSet-1
27	POM-A	p-Nitrosodiphenylamine [POM]	Existing	No	e	ChemSet-1
28	POM-A	PBBs (Polybrominated biphenyls) [POM] including but not limited to:	Existing	No	e	ChemSet-1
29	POM-A	2-Phenylphenol [POM]	New	No	e	ChemSet-1
30	POM-A	Decabromodiphenyl oxide (BDE-203) [POM]	Existing	No	e	ChemSet-1
31	POM-A	Reserpine [POM]	Existing	No	e	ChemSet-1
32	POM-A	Triorthocresyl phosphate [POM]	Existing	No	e	ChemSet-1
33	POM-A	Triphenyl phosphate [POM]	Existing	No	e	ChemSet-1
34	POM-A	Triphenyl phosphite [POM]	Existing	No	e	ChemSet-1
35	POM-A	Tamoxifen citrate [POM]	New	No	e	ChemSet-1
36	POM-B2	Dibenz[c,h]acridine [POM]	New	No	ChemSet-2	ChemSet-2

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
"ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
A letter e ("e") is shown for Effective Phase to indicate Appendix A chemical substance prior to MMY Regulation amendment. These are required to be reported without phasing.
An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MMY Regulation amendment. These are required to be reported without phasing.

**Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
Fibrous Materials**

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	FIB-A	Mineral fibers (other than man-made) including but not limited to:	Existing	No	e	ChemSet-1
2	FIB-A	Asbestos	Existing	No	e	ChemSet-1
3	FIB-A	Actinolite	New	No	ExistGrp	ChemSet-1
4	FIB-A	Amosite	New	No	ExistGrp	ChemSet-1
5	FIB-A	Anthophyllite	New	No	ExistGrp	ChemSet-1
6	FIB-A	Chrysotile	New	No	ExistGrp	ChemSet-1
7	FIB-A	Crocidolite	New	No	ExistGrp	ChemSet-1
8	FIB-A	Tremolite	New	No	ExistGrp	ChemSet-1
9	FIB-A	Erionite	Existing	No	e	ChemSet-1
10	FIB-A	Fluoro-edenite fibrous amphibole	New	No	ExistGrp	ChemSet-1
11	FIB-A	Talc containing asbestiform fibers	Existing	No	e	ChemSet-1
12	FIB-A	Silica, crystalline (respirable), in the form of quartz or cristobalite	Existing	to be determined ¹	e	ChemSet-1
13	FIB-A	Silica, crystalline (respirable), in the form of cristobalite	New	to be determined ¹	ExistGrp	ChemSet-1
14	FIB-A	Silica, crystalline (respirable), in the form of quartz	New	to be determined ¹	ExistGrp	ChemSet-1
15	FIB-B2	Wollastonite (Calcium silicate naturally occurring as Wollastonite)	Existing	No	ChemSet-2	ChemSet-2
16	FIB-B2	Mica	Existing	No	ChemSet-2	ChemSet-2

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MMYY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MMYY Regulation amendment. These are required to be reported without phasing.

1. Studies have been done but specific CARB or EPA Test Method not clear.

**Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
Other Chemicals (miscellaneous)**

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	OTH-A	n-Butyl alcohol	Existing	No	e	ChemSet-1
2	OTH-A	Tri-n-butyl phosphate (TbUP) (see Phosphorus compounds: Tributyl phosphate)	Existing	No	e	ChemSet-1
3	OTH-B2	Ammonium chloride	New	No	ChemSet-2	ChemSet-2
4	OTH-B2	Calcium cyanide	New	No	ChemSet-2	ChemSet-2

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

**Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
PCDD/PCDFs and PCBs**

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	DF-A	Dioxins, total, w/o individ. isomers reported [PCDDs] [POM]	Existing	CARB 428	e	e
2	DF-A	Dioxins, total, with individ. isomers also reported [PCDDs] [POM]	Existing	CARB 428	e	e
3	DF-A	2,3,7,8-Tetrachlorodibenzo-p-dioxin [TCDD] [POM]	Existing	CARB 428	e	e
4	DF-A	1,2,3,7,8-Pentachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
5	DF-A	1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
6	DF-A	1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
7	DF-A	1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
8	DF-A	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
9	DF-A	1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
10	DF-A	Total Tetrachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
11	DF-A	Total Pentachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
12	DF-A	Total Hexachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
13	DF-A	Total Heptachlorodibenzo-p-dioxin [POM]	Existing	CARB 428	e	e
14	DF-A	Dibenzofurans (Polychlorinated dibenzofurans) [PCDFs] [POM]	Existing	CARB 428	e	e
15	DF-A	2,3,7,8-Tetrachlorodibenzofuran [POM]	Existing	CARB 428	e	e
16	DF-A	1,2,3,7,8-Pentachlorodibenzofuran [POM]	Existing	CARB 428	e	e
17	DF-A	2,3,4,7,8-Pentachlorodibenzofuran [POM]	Existing	CARB 428	e	e
18	DF-A	1,2,3,4,7,8-Hexachlorodibenzofuran [POM]	Existing	CARB 428	e	e
19	DF-A	1,2,3,6,7,8-Hexachlorodibenzofuran [POM]	Existing	CARB 428	e	e
20	DF-A	1,2,3,7,8,9-Hexachlorodibenzofuran [POM]	Existing	CARB 428	e	e
21	DF-A	2,3,4,6,7,8-Hexachlorodibenzofuran [POM]	Existing	CARB 428	e	e
22	DF-A	1,2,3,4,6,7,8-Heptachlorodibenzofuran [POM]	Existing	CARB 428	e	e
23	DF-A	1,2,3,4,7,8,9-Heptachlorodibenzofuran [POM]	Existing	CARB 428	e	e
24	DF-A	1,2,3,4,6,7,8,9-Octachlorodibenzofuran [POM]	Existing	CARB 428	e	e
25	DF-A	Total Tetrachlorodibenzofuran [POM]	Existing	CARB 428	e	e
26	DF-A	Total Pentachlorodibenzofuran [POM]	Existing	CARB 428	e	e
27	DF-A	Total Hexachlorodibenzofuran [POM]	Existing	CARB 428	e	e
28	DF-A	Total Heptachlorodibenzofuran [POM]	Existing	CARB 428	e	e

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
"ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A, prior to MM/YY Regulation amendment. These are required to be reported without phasing.

Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
PCDD/PCDFs and PCBs

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
29	PCB-A	PCBs (Polychlorinated biphenyls), total [POM] including but not limited to:	Existing	CARB 428	e	e
30	PCB-A	2,3,3',4,4',5,5'-HEPTACHLOROBIPHENYL (PCB 189)	Existing	CARB 428	e	e
31	PCB-A	2,3,3',4,4',5-HEXACHLOROBIPHENYL (PCB 156)	Existing	CARB 428	e	e
32	PCB-A	2,3,3',4,4',5-HEXACHLOROBIPHENYL (PCB 157)	Existing	CARB 428	e	e
33	PCB-A	2,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 167)	Existing	CARB 428	e	e
34	PCB-A	3,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 169)	Existing	CARB 428	e	e
35	PCB-A	2,3,3',4,4'-PENTACHLOROBIPHENYL (PCB 105)	Existing	CARB 428	e	e
36	PCB-A	2,3,4,4',5-PENTACHLOROBIPHENYL (PCB 114)	Existing	CARB 428	e	e
37	PCB-A	2,3',4,4',5-PENTACHLOROBIPHENYL (PCB 118)	Existing	CARB 428	e	e
38	PCB-A	2,3',4,4',5-PENTACHLOROBIPHENYL (PCB 123)	Existing	CARB 428	e	e
39	PCB-A	3,3',4,4',5-PENTACHLOROBIPHENYL (PCB 126)	Existing	CARB 428	e	e
40	PCB-A	3,3',4,4'-TETRACHLOROBIPHENYL (PCB 77)	Existing	CARB 428	e	e
41	PCB-A	3,4,4',5-TETRACHLOROBIPHENYL (PCB 81)	Existing	CARB 428	e	e
42	PCB-B1	Chlorodiphenyl (42% Chlorine, PCB 1242)	New	to be determined ¹	ChemSet-1	ChemSet-1
43	PCB-B1	Chlorodiphenyl (54% Chlorine, PCB 1254)	New	to be determined ¹	ChemSet-1	ChemSet-1

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

1. CARB Method 428 only lists general compounds, e.g., "dichlorobiphenyls". Whether this can be applied to PCB 1242 and 1254 is to be determined.

Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
Volatile Organics (except aldehydes)

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	ORG-A	Benzene	Existing	EPA TO-14	e	e
2	ORG-A	Toluene	Existing	EPA TO-14	e	e

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

**Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
Aldehydes**

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	ALD-A	Formaldehyde	Existing	CARB 430	e	e

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MMY Regulation amendment. These are required to be reported without phasing.

An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MMY Regulation amendment. These are required to be reported without phasing.

**Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
Inorganics (Cl2, HCl)**

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	INO-A	Chlorine	Existing	EPA 0050	e	e
2	INO-A	Hydrochloric acid	Existing	CARB 421	e	e

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

**Table 1 -- AB2588 Chemical List with Effective Date Changes Proposed, Sept. 15, 2020
Metals (including metals compounds)**

Row #	Group	Substance	Existing or New to Appendix A	Included as an Analyte in a Test Method	Effective Phase - Specified	Effective Phase - Proposed
1	MET-A	Aluminum	Existing	CARB 436	e	e
2	MET-A	Antimony	Existing	CARB 436	e	e
3	MET-A	Arsenic	Existing	CARB 436	e	e
4	MET-A	Barium	Existing	CARB 436	e	e
5	MET-A	Beryllium	Existing	CARB 436	e	e
6	MET-A	Cadmium	Existing	CARB 436	e	e
7	MET-A	Chromium	Existing	CARB 436	e	e
8	MET-A	Cobalt	Existing	CARB 436	e	e
9	MET-A	Copper	Existing	CARB 436	e	e
10	MET-A	Lead	Existing	CARB 436	e	e
11	MET-A	Manganese	Existing	CARB 436	e	e
12	MET-A	Mercury	Existing	CARB 436	e	e
13	MET-A	Nickel	Existing	CARB 436	e	e
14	MET-A	Phosphorus	Existing	CARB 436	e	e
15	MET-A	Selenium	Existing	CARB 436	e	e
16	MET-A	Silver	Existing	CARB 436	e	e
17	MET-A	Thallium	Existing	CARB 436	e	e
18	MET-A	Tin	New	No	ChemSet-2	ChemSet-2
19	MET-A	Vanadium	Existing	CARB 436	e	e
20	MET-A	Zinc	Existing	CARB 436	e	e
21	METC-A	Zinc oxide	Existing	Metal only	e	e
22	METC-A	Barium sulfate	New	Metal only	ExistGrp	ExistGrp

Notes from ARB Appendix A:

"ChemSet-1" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with 2022 emission inventory data year for facilities in District Group A, or 2023 for facilities in District Group B
 "ChemSet-2" is shown for Effective Phase to indicate newly added chemical substances that must be reported starting with the 2026 emission inventory data year for facilities in District Group A, or 2027 for facilities in District Group B
 A letter e ("e") is shown for Effective Phase to indicate an existing Appendix A chemical substance prior to MM/YY Regulation amendment. These are required to be reported without phasing.
 An existing group ("ExistGrp") is shown for Effective Phase to indicate any substance under or added under an existing grouping in Appendix A prior to MM/YY Regulation amendment. These are required to be reported without phasing.

INFORMAL REVIEW DRAFT

07/27/2020

Industry/Emitting Process level 1	Industry/Emitting Process level 2	Industry/Emitting Process level 3	Some Specific Substances (Gaseous, aerosol, and particulate releases including but not limited to) Chemicals newly added to Appendix C are shown in <u>underline bold text</u>
Clay, Glass & Stone Products (SIC 32xx)	Cement Manufacturing (SIC 3241)	Particulate, Gaseous, Aerosol Emissions including but not limited to: From stacks, feed to mill & air separator, kiln, dryers, grinders	<u>Ammonium chloride, Barium sulfate, Benzene, Benzaldehyde, Beryllium, n-Butyl alcohol, Cadmium, Calcium cyanide, Chromium, Cobalt, Copper, Formaldehyde, Hydrogen chloride, Lead, Manganese, Mica, Mineral fibers (asbestos and related), Nickel, PAHs and PAH-related compounds, PCBs, POM, Tri-n-butyl phosphate, Wollastonite, Zinc, Zinc oxide, All listed metals</u>
Clay, Glass & Stone Products (SIC 32xx)	Cement Manufacturing	Clinker Cooler	-
Clay, Glass & Stone Products (SIC 32xx)	Cement Manufacturing	Combustion Processes – Also see Combustion Appendix C-1	Benzene, Formaldehyde, Hydrogen chloride, PAHs and PAH-related compounds, PCBs, POM, All listed metals
Clay, Glass & Stone Products (SIC 32xx)	Cement Manufacturing	Dry Processes	-
Clay, Glass & Stone Products (SIC 32xx)	Cement Manufacturing	Hydraulic	Arsenic, Cadmium, Chlorine, Chromium, Copper, Hydrogen chloride, Lead, Mercury, Nickel, Toluene, Zinc
Clay, Glass & Stone Products (SIC 32xx)	Cement Manufacturing	Wet Process	-
Clay, Glass & Stone Products (SIC 32xx)	Clay Products, Structural (SIC 325x)	-	-
Clay, Glass & Stone Products (SIC 32xx)	Clay Products, Structural (SIC 325x)	Brick & Structural Clay Tile (SIC 3251)	Arsenic, Beryllium, Calcium oxide, Chromium hexavalent, Chromium (III) Sulfate, Lead, Lead chromate

Attachment 4 – Copy of Letter Submitted to CARB Dated September 14, 2020

September 14, 2020

Mr. Gabe Ruiz
Manager, Toxics Inventory and Special Projects Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Mr. Ruiz:

On behalf of the California Cement Manufacturers Environmental Coalition, we would like to thank you and other CARB staff members for accommodating a continuing dialogue to resolve the cement industry's concerns with proposed revisions to the AB 2588 reporting regulations.

Our industry's historical goal has been to work closely with CARB in the development of policies that are workable to both CARB's objectives and the cement industry's ability to effectively and efficiently comply with those objectives. This current correspondence provides further clarification of the topics discussed during our September 8th teleconference with you and other staff members, and as such is the second letter from CCMEC in response to the draft amended AB 2588 Emission Inventory and Criteria Guidelines (EICG) dated July 28, 2020. Upon your internal review of the concepts provided in this correspondence, CCMEC looks forward to further conversations with CARB in the EICG rule development process pertinent to the Portland Cement manufacturing industry.

The purpose of this letter is to provide background information on the cement industry's approach to compliance with the AB 2588 chemical list as shown in Appendices A and C of the EICG and as discussed on a call with CARB staff on September 8, 2020. After presenting some information on the historical approach used by cement companies to address the existing chemical list, we will describe the proposed approach for addressing the new chemicals added.

Historical approach for existing chemical list prior to proposed EICG changes:

For the AB 2588 chemical list in effect prior to the rule changes, here is the procedure followed by cement companies for AB 2588 compliance:

- Identify applicable chemical groups, such as metals, volatile organics, PAHs, PCDD/PCDF, and other groups;
- Identify test method for each chemical group;
- Perform testing using available test method for all analytes addressed by the method;
- Develop and apply a policy for non-detect values;
- Use the results in health risk calculations (per OEHHA procedures); and
- Repeat testing in case of a significant process or equipment change (per rule language).

Mr. Gabe Ruiz
Page 2 of 3
September 14, 2020

To the extent that new chemicals are added, the cement companies will try to fit these new chemicals into the above construct for addressing all chemicals, as discussed further below.

Planned approach for new chemical list in proposed EICG changes:

We understand from our September 8, 2020, telephone conversation with CARB that the Appendix C chemical listing is a suggested list only, and that each source category is expected to carry out a vetting process to decide if the suggested chemicals in Appendix C apply to that source category and, if they do apply, determine whether quantification methods are available. We plan to separately provide comments on the Appendix C upfront language to further convey the concept (as stated on the phone call) that this is a suggested list only.

Here are the steps that the cement companies plan to use when processing the new chemicals added to Appendix C, to be able to address them in the same way that the original chemical list has been addressed for the past 20 years or more. We are focusing on the new chemicals from Appendix A that are shown in Appendix C, as an initial step in addressing the full Appendix A list in the future.

- Step 1 – Evaluate whether the new chemical applies to cement: If there is no specific basis for thinking that the chemical applies to cement, the chemical will be eliminated from further consideration. For chemicals that apply to cement, proceed to Step 2.
- Step 2 – Identify the source test method for the chemical group that the new chemical falls in and the analytes covered by that source test method: If the chemical is not listed as an analyte in a standard EPA or CARB published source test method, the chemical will not be reported. For chemicals that have a standard EPA or CARB published source test method, proceed to Step 3.
- Step 3 – Perform testing on the new chemical: If the chemical is not detected in source testing (per the procedure for handling non-detect values, to be agreed upon at a later time), the chemical will not be reported. For chemicals detected, these will be reported.

To the extent that the above steps will require some time to complete, we plan to separately provide comments on the “effective date” for the new chemicals.

If a new chemical is added after the rule effective date, or if a new EPA or CARB source test method is published after the rule effective date, these will be addressed with an agreed upon schedule.

CCMEC appreciates the opportunity to comment on CARB’s amended AB 2588 Emission Inventory and Criteria Guidelines (EICG) dated July 28, 2020 and looks forward to our next discussion with CARB to address the cement industry concerns.

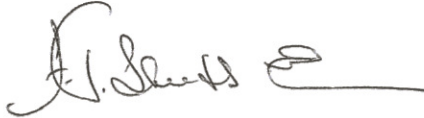
CALIFORNIA CEMENT MANUFACTURERS ENVIRONMENTAL COALITION

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Mr. Gabe Ruiz
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September 14, 2020

For questions and/or concerns please feel free to contact me at your convenience.

Sincerely,



Frank T. Sheets
CCMEC Chairman
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FSheets@StrategicPartnersGroup.org

cc: Mr. Richard Corey, California Air Resources Board
Mr. David Edwards, California Air Resources Board
Mr. Greg Harris, California Air Resources Board