



August 1, 2019

Clerk of the Board
California Air Resources Board

Re: Comments on the Modified Text from the Second Notice for the Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants

Clerk of the Board:

The San Diego County Air Pollution Control District (District) appreciates the opportunity to review the Modified Text from the Second Notice for the Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR Regulation) and again would like to commend the staff in the Criteria Pollutant and Air Toxics Reporting Section for their efforts and stakeholder involvement in crafting the Modified Text. The District supports the decision to remove the additional applicability requirements from this rulemaking, and looks forward to working with you in a full rulemaking process for this in the future.

The District has the following comment on the latest modified text of the CTR Regulation:

1. Section 93402(a): Definition of "Activity Level": While removing the allowance to ask for fuel use data in MMscf may serve the uniformity goal (as mentioned in the notice), it will impede the ability of districts to conduct an accurate inventory. This might make sense for sources combusting only PUC regulated natural gas (which has a known higher heating value); however, it makes no sense for sources fired on landfill, digester or field gas, as these gases have varying higher heating values. For combustion of these gases, some emission calculations rely on the MMscf data, not the MMBtu data. By not allowing a district to ask for the MMscf data, the District would need to either ask for the higher heating value or make assumptions, which would delay the inventory and/or question the accuracy of the inventory. The overall goal should be to conduct the most accurate inventory in the most efficient manner – this proposed change does neither.

The District looks forward to working with CARB to implement this regulation.

Should you have any question about these comments, please contact the undersigned at (858) 586-2715 or jim.swaney@sdcounty.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Swaney".

Jim Swaney, P.E.
Chief – Engineering Division
San Diego Air Pollution Control District