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Christopher D. Brown, AICP
Air Pollution Control Officer

December 10, 2018

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Regulation for the Reporting of Criteria and Toxic Air Contaminants (CTR2018)

Dear Chair Nichols and the Members of the Board,

The Feather River Air Quality Management District (District) appreciates the opportunity to provide comments on the proposed Regulation.

The District would like to ask that CARB make the Regulation effective upon adoption in Section 93403 and 93403 (a)(1) and not retroactive as currently written.

Section 93403 makes 2018 activity and emissions subject to the reporting and recordkeeping requirements. However, in the final days of 2018 the Regulation is still in draft form and neither adopted by CARB nor approved by the Office of Administrative Law. While most of the data requested in the Regulation should be maintained by the stationary sources and already reported to the District, it is conceivable that some equipment or operations may not be (especially portable equipment or seasonal operations that may not track precise locations on a facility footprint).

By making the Regulation effective after adoption and approval, the District would have an opportunity to update throughput collection forms and processes to accommodate the requirements of the Regulation. The District recommends making the effective date the first full year after the Regulation is approved (i.e. effective for 2020 activity if the Regulation is approved prior to December 31, 2019).

Thank you for your consideration,

Christopher D. Brown, AICP #018108
Air Pollution Control Officer