



November 13, 2020

Mr. Richard Corey
Executive Officer

Mr. Greg Harris
Chief, Emission Inventory and Economic Assessment Branch

California Air Resources Board
1001 I Street
Sacramento, CA 95814
E-mail: ab2588ei@arb.ca.gov

Subject: CalPortland Company (CPC) comments on CTR and EICG Rule

Dear Messrs. Corey and Harris:

On behalf of CalPortland Company (CPC), we desire to submit comment on the CTR (AB 2588) Emission Inventory and Criteria Guidelines (EICG) effort. CPC is focusing on observations regarding the EICG rule development process that will impact our cement manufacturing business.

CPC adds our voice to other requests that CARB delay action or make modifications on this effort until a clear assessment can be made for each compound under consideration. Several of our colleagues requested that three items be addressed.

They are:

If a chemical does not have a published toxicity factor, the chemical does not need to be reported, in terms of chemical presence, amounts used or produced, or emission quantities.

If a chemical has a published toxicity factor but does not have published lab analysis procedures, the chemical does not need to be reported, in terms of chemical presence, amounts used or produced, or emission quantities.

If a chemical has a published toxicity factor and published lab analysis procedures but does not have a published source test method, the chemical emissions do not need to be reported, and no emission estimates are required.



CalPortland supports these items as well and hope that these reasonable requests can be accommodated.

We have been assured that procedures adopted by Air Districts will be independent from the State, since implementation has been delegated to the Air Districts—we would appreciate if this can be confirmed in the Board Meeting later this month. CPC encourages CARB staff to state this in the rule itself and in any staff reports under consideration so that it will be crystal clear to all that seek to comply with any new regulatory construct.

As mentioned above, we want to emphasize that reporting for any newly listed chemicals should be limited to cases where there are published toxicity factors, published lab analysis procedures and published source test methods. A clear scientific basis for reporting is necessary, to avoid creating confusion for regulatory agencies, for affected facilities, and especially for the public is required. Any reporting of new chemicals, where there is no conclusive scientific basis for reporting, can add little to the existing AB2588 program because chemicals that have no scientific information on them (and may not even be present) are mixed in with chemicals that have been measured using scientific lab analysis and source test methods.

CPC hopes that CARB will modify the AB 2588 EICG proposed rule language as we have suggested before the rule is considered by the CARB Board in a few weeks. Our comments are aimed at seeking greater clarity, avoiding confusion and strengthening any effort staff is proposing to take to the Governing Board. As stated, this effort can be delayed a bit and the additional time used to strengthen it. For example, with more time more outreach to the local air districts and the regulated community can occur ensuring better coordination. We are aware of several local air districts who have expressed concerns in filed comments about the need for more outreach and collaboration. We certainly support that position as well.

Please let us know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Regis', with a long horizontal stroke extending to the right.

Steve Regis
Senior Vice President, Corporate Services
CalPortland Company

cc: Mr. Richard Corey, California Air Resources Board
Mr. David Edwards, California Air Resources Board
Mr. Gabe Ruiz, California Air Resources Board
Mr. John Swanson, California Air Resources Board
Mr. John Dunlap, Dunlap Group