



Ventura County  
Air Pollution  
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Dr. Laki Tsopulos, P.E.  
Air Pollution Control Officer

November 15, 2020

Richard Corey, Executive Officer  
California Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

**SUBJECT: Proposed Criteria Pollutant and Toxics Emissions Reporting (CTR) and Emissions Inventory Criteria and Guidelines (EICG) Regulations Revisions**

Dear Mr. Corey:

Ventura County Air Pollution Control District (VCAPCD) staff appreciates the opportunity to submit comments on the proposed amendments to the CTR and EICG regulations.

We especially appreciate the cooperation and collaboration we have had with the California Air Resources Board (CARB) staff as the CTR Regulation has evolved and look forward to continuing our collaborative relationship toward ensuring its effective implementation. As you know, VCAPCD staff is very supportive of the laudable intent of the CTR regulation and the benefits it may produce to many EJ and disadvantaged communities statewide.

We also want to acknowledge that the proposed amendments to the CTR Regulation go a long way in addressing some of our earlier concerns. However, there are several remaining aspects of the proposal that we would like to bring to your attention that we believe will be impactful to our agency and the businesses in Ventura County.

### **Regulation Implementation Cost**

In the Staff Report: Initial Statement Of Reasons (ISOR) for the amendments to the CTR Regulation, CARB recognizes that local air districts have played a historically important role in processing, verifying and managing facility emissions data, that these actions are central to the proposed regulation's implementation, and that the districts' knowledge is

necessary to ensure the success of the statewide reporting program. CARB also acknowledges that the local air districts will provide assistance to smaller facilities for reporting criteria and toxics emissions data and that some local air districts may need to add staffing to manage additional workload they may incur in implementing the regulation. This will result in significant costs to the local air agencies. According to the CTR public notice, the ten-year cost for local air districts to implement provisions of the regulation will be approximately \$39.0 million. We urge CARB to work with the local air districts to develop a mechanism to assist small-to-medium size local air districts with limited resources with the implementation expenses of this very important statewide regulation. Additionally, most of the affected facilities will be small businesses with limited technical-ability and experience with emission reporting programs. Although the ISOR suggests the regulation will have minimal cost impacts for the typical affected business, we expect they will bear significant expense to comply with the CTR Regulation.

### **Expansion of Workload for Local Agencies**

The number of facilities required to report under the applicability threshold of 4 tons per year (tpy) or more of any criteria pollutant emissions (CTR § 93401(a)(4)(A)) and facilities emitting toxic air contaminants (CTR reporting under 93401(a)(4)(C)) will be well over 1000 facilities in Ventura County. The result will be a substantial increase in workload and expense for our agency.

### **Criteria Pollutant Reporting Threshold**

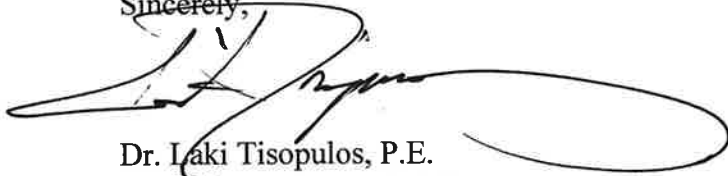
CTR regulation § 93401(a)(4)(A) establishes a new CTR applicability threshold of 4 tons per year (tpy) for criteria pollutant emissions (except carbon monoxide). Staff believes the 4 tpy reporting threshold aligns with Districts with an ‘extreme’ federal ozone non-attainment area. Most districts have much less severe air quality problems and have lower nonattainment classifications or are in attainment of the ozone standard, and a less stringent reporting threshold would be more appropriate for them.

### **Reduced Reporting for Small Toxic Emitting Facilities**

Section 93401(a)(4)(C) has emissions reporting applicability for facilities emitting airborne toxic air contaminants, listed in Table A-3 in Appendix A of the regulation. The initial reporting years are shown in Table A-1. According to the ISOR rationale for Table A-1, facilities classified under sector phase 1 in Table A-3 will report emissions in an initial reporting year but not again until four years later, then annually thereafter. In effect, this initially amounts to quadrennial reporting for these facilities. Many of the facilities in Table A-3 tend to be small businesses with limited resources and technical expertise, and emissions may not change substantially year by year. We should consider making permanent this less burdensome quadrennial reporting schedule for these small emission sources, as had been practiced under the Emission Inventory Criteria and Guidelines Report for the Air Toxics “Hot Spots” Program (EICG).

VCAPCD staff wishes to reiterate its overall support of the CTR Regulation and reaffirm our commitment to working with CARB to implement it in a cost-effective manner that is fair to local air agencies and small businesses affected by the regulation. If you have any questions regarding this letter or its contents, please feel free to contact me at (805) 645-1440.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laki Tisopulos', with a large, sweeping flourish extending to the right.

Dr. Laki Tisopulos, P.E.  
Air Pollution Control Officer

cc: Dave Edwards, CARB  
Gabe Ruiz, CARB  
John Swanson, CARB

