



# REGIONALSAN

TAKING THE WASTE OUT OF WATER

Sacramento Regional County Sanitation District

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## Board of Directors

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[www.regionalsan.com](http://www.regionalsan.com)

November 16, 2020

Mr. Greg Harris, Branch Chief  
Greenhouse Gas and Toxics Emissions Inventory Branch  
Air Quality Planning and Science Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

*Transmitted online via*

CTR: [https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=ctr2020&comm\\_period=A](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=ctr2020&comm_period=A)

EICG: [https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=hotspots2020&comm\\_period=A](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=hotspots2020&comm_period=A)

**SUBJECT: Comment Letter – Proposed Amendments to the Air Toxics “Hot Spots” Program Emission Inventory Criteria and Guidelines (EICG) and to the Reporting of Criteria Air Pollutants and Toxic Air Contaminants Regulation (CTR)**

Dear Mr. Harris:

The Sacramento Regional County Sanitation District (Regional San) appreciates the opportunity to comment on the proposed amendments to both the EICG and CTR posted by the California Air Resources Board (CARB), in support of harmonizing these efforts and developing a strategy through which the wastewater sector can respond. Regional San provides wastewater conveyance, treatment, and reclamation for over 1.4 million residents in the Sacramento metropolitan area, and would be affected by the proposed amended regulations as they relate to the Sacramento Regional Wastewater Treatment Plant.

Regional San is supportive of the comments provided by the California Association of Sanitation Agencies (CASA). We echo CASA’s request to clearly document 1) an approach that would allow the wastewater sector enough time to complete a statewide pooled emissions study and 2) the ability to continue reporting annual emissions without the inclusion of new air toxics as the statewide pooled emissions study is executed. Wastewater treatment facilities will need to perform a two-step process on all identified potential sources because these facilities cannot control the amount of Appendix A-1 compounds they receive and no emission quantification methods currently exist for most of the Appendix A-1 compounds.

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We appreciate the efforts of CARB and staff in attempting to resolve these key issues and encourage you to continue to work with the wastewater community to ensure that the implementation of the regulations is successful.

If you have any questions or concerns regarding our comments, please contact me directly at 916-876-6092 or [mitchellt@sacsewer.com](mailto:mitchellt@sacsewer.com), or contact Heidi Oriol at 916-875-6481 or [oriolh@sacsewer.com](mailto:oriolh@sacsewer.com).

Sincerely,

A handwritten signature in blue ink that reads "Terrie L. Mitchell". The signature is written in a cursive style with a large initial "T" and "M".

Terrie Mitchell  
Manager, Legislative and Regulatory Affairs

cc: Sarah Deslauriers, CASA  
Heidi Oriol, Regional San