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November 16, 2020

Richard Corey, Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814
Electronic Submittal: <http://www.arb.ca.gov/lispub/comm/bclist.php>

SUBJECT: Comments on the Proposed Amendments to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants and the Emissions Inventory Criteria and Guidelines.

Dear Mr. Corey,

The Northern Sonoma County Air Pollution Control District (NSCAPCD or District) appreciates the opportunity to review and comment on the proposed amendments to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR) and the AB 2588 Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines Regulation (EICG). We appreciate the outreach and discussion provided by CARB staff on this matter. The District generally agrees with many of the points submitted in comments by other Districts and would like to suggest one additional comment that the District believes could improve implementation of the Program.

The NSCAPCD notes a gap in the current proposed rule that should be resolved for successful implementation. Specifically, the proposed rule does not articulate how CARB will perform outreach and provide training and assistance for small business affected by the rule. CARB is proposing to create a brand-new technical reporting system with a mandatory compliance requirement. Upon the arrival of this compliance date, small business is expected to collect and develop new types of data, and then input this data into a brand-new state-run system. Small business owners who do not have air quality expertise are expected to determine their own compliance applicability and obligations. Many of the required data elements regarding the facility, pollutants, and emission factors will be new requirements that are not currently included under current District permits.

Although this is a state rule, small business will expect or request that their local air district assist them. Local districts do have air quality expertise, but district regulations, reporting requirements, data systems, and practices (which are born from SIP-approved elements) are tailored to the air quality status and resources of their territory and therefore are disparate from the requirements of the State’s proposed inventory-based rule. Districts, such as the NSCAPCD, do not have data systems capable of holding and

managing the proposed data points. In addition, several of the proposed data points are not in permits or in file and will need to be created for the first time. Districts are not being provided resources to support local business under this rule; therefore, the NSCAPCD strongly encourages CARB to implement a robust outreach program to help affected small business comply and to be successful with the proposed rule.

Thank you again for the opportunity to review and comment on the proposed amendments. Please do not hesitate to contact me at 7070-433-5911 or by email at Rob@NoSoCoAir.net should you have any questions or would like any clarification.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rob Bamford", with a stylized flourish at the end.

Robert Bamford
Executive Officer / APCO
NSCAPCD