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December 7, 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 Members of the Board:

The Butte County Air Quality Management District (District) provides the following comments on the proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants. We appreciate the efforts of CARB staff in conferring with districts about their established programs in the development of these proposed regulations.

In light of recent catastrophic events in our District and the State, we would recommend this regulation (and others) include a provision to allow a source subject to this regulation the ability to submit a request to the Executive Officer for relief from this regulation, including reporting and recordkeeping provisions, if the source has been subject to a catastrophic event such as an earthquake, fire or other natural event that prohibits the ability to report emissions and/or maintain the records as required. The enforcement provisions of proposed Section 93407 do not appear to offer any relief if a source and/or its records have been destroyed.

We wish to express our appreciation again for the considerable work CARB staff have devoted to this regulation.

Sincerely,

A handwritten signature in blue ink that reads "David J. Lusk". The signature is fluid and cursive.

David J. Lusk
Assistant Air Pollution Control Officer