



South Coast Air Quality Management District

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April 14, 2021

Richard Corey, Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814

Comments on CARB's Modified Text to the Proposed Amendments to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (Version 3/30/21)

Dear Mr. Corey,

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on CARB's Modified Text for the Proposed Amendments to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR). We have been working closely with your staff on the CTR regulation and greatly appreciate the dialogue and improvements to the regulation in response to our articulated concerns. In particular, staff appreciates CARB's consideration of resource constraints in the phased implementation of the regulations that are inherently linked by AB 617. We would like to, however, reiterate the concern we have regarding assistance and funding for implementation and outreach of the CTR.

As stated on many occasions and previous comment letters, the implementation of the CTR will require continued funding support. While we have many of the resources necessary for successful implementation, additional financial support for staffing, programming, and especially outreach to the reporting facilities will be needed. Outreach to the many affected facilities in the South Coast jurisdiction and technical assistance during the reporting season will likely be extensive. The vast majority of Additional Applicability Facilities that begin reporting emissions for 2022 data in 2023 do not currently report emissions, and it will be extremely difficult for local air districts to identify applicable facilities using activity level reporting thresholds based on either toxic mass emissions or material usage since this data is not available for facilities that have never reported. Training and outreach for these facilities should also begin prior to the start of the data year in order to prepare facilities for expected reporting requirements. We have a team of 10 staff that assist a universe of approximately 1,600 facilities currently subject to reporting. We will have to substantially update our emissions reporting system and staff to accommodate the thousands of additional facilities that will be required to report emissions, an effort that we estimate will exceed \$1M. Additional resources are needed if the programs are to be significantly expanded and given the current economic climate created by COVID, fee increases may not be practical. We seek

commitments from CARB to provide the requested assistance and funding to ensure the successful implementation of the CTR.

Attached are additional comments on remaining items that we believe are necessary for successful implementation CTR.

Again, we appreciate the opportunity to comment. South Coast AQMD staff are committed to working with CARB for the successful implementation of these program updates. If you or your staff have any questions, please feel free to call Ian MacMillan, Assistant Deputy Executive Officer, at (909) 396-3244.

Sincerely,

A handwritten signature in black ink that reads "Sarah Rees". The script is fluid and cursive, with the first letters of each name being capitalized and prominent.

Sarah Rees, Ph.D.
Deputy Executive Officer
Planning, Rule Development & Area Sources
South Coast Air Quality Management District

SLR:IM:EK

Cc: Dave Edwards, CARB
John Swanson, CARB
Gabe Ruiz, CARB
Tung Le, CAPCOA

Attachment

Additional Comments to the Modified Text to Proposed Amendments to CTR (Version 3/30/21)

1. 93403 (b)(3)(A) Release Location Data Reporting

- Please modify language to allow a local air district to request release location data at any time (not only prior to the beginning of the data year).

2. 93404 (b)(1)(C)(10) Emission Calculation Method:

- This section refers to Section 93404(d) for the emission calculation method, but the current version of the proposed CTR no longer contains this section.
- Please add the section back in, or remove the requirement altogether.
- Section 93404(d) language in previous version of the proposed CTR:
"Calculation methods must identify the general methods used, such as continuous emissions monitoring system, facility-specific emission factors, facility source test data, air district emission provided emission factors provided by an air district, or U.S. EPA emission factors. If activity data is used to calculate emissions, the reported calculation method must include a general description of the technique used to acquire the activity data, such as sales records, measurement devices, material balance, throughput, or material produced used to quantify parameters to which emission factors are applied."

3. 93404 (b)(1)(C)(12) Report Amount of Substance Produced or Used

- This section allows facilities to report the amount of a toxic substance that is produced or used at the facility during the data year, if no best available data and methods exist to estimate the quantity of the substance that is emitted during the data year, pursuant to section 93404(c)(1)(B)
- Section 93404(c)(1)(B) references the use of data sources such as purchase records and substance inventory reconciliation to estimate amounts, however, specific guidance and examples of calculations are needed to avoid differing interpretations from local air districts and reporters. Without this, values from facilities and local air districts will not be comparable.