



ARID Technologies, Inc.

14 April 2021

Mr. Gabe Ruiz

Manager, Toxics Inventory and Special Projects

Air Quality Planning and Science Division

California Air Resources Board

Re: Modified Text for the Amendments to the Emission Inventory Criteria and Guidelines Report for the Air Toxics "Hot Spots" Program

Dear Mr. Ruiz,

With reference to the proposed 15-day changes, ARB States,

1. Modifications to Section I. Purpose and How to Use This Report. Section I is modified to include clarifying language that air districts have the authority to adopt more stringent requirements than those outlined in the EICG. The change was made to align with Section 44365(b) of the Health and Safety Code that reads:
2. "This part does not prevent any district from establishing more stringent criteria and requirements than are specified in this part for approval of emissions inventories and requiring the preparation and submission of health risk assessments. Nothing in this part limits the authority of a district under any other provision of law to assess and regulate releases of hazardous substances."

With reference to the attached Study from Columbia University and the Johns Hopkins Bloomberg School of Public Health entitled, "*Vent Pipe Emissions from Storage Tanks at Gas Stations; Implications for Setback Distances*", ARID Technologies supports air districts establishing more stringent criteria and requirements regarding reducing benzene emissions from fuel station storage tank vent lines. These pervasive emissions typically occur in the off-hours and during Holiday shut down periods at California fuel stations.

We think that science and engineering should lead the process for optimizing toxic emissions reductions with associated economic benefit. We also think that fuel marketers should be given options for choosing the most cost-effective means to comply with logical regulations, considering site specific factors for individual marketers.

Given the transition to the Biden Administration, with robust rulemaking, the power and creativity of inventors and entrepreneurs can be unleashed to further innovate and provide elegant solutions to a wide array of current and future energy and environmental challenges.

Sincerely,

Tedmund Tiberi

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President & Founder

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