Santa Barbara County
Air Pollution Control District

May 20, 1993

Mr. James Boyd
Executive Officer
Air Resources Board
2020 L Street
P.O. Box 2815
Sacramento, CA 95812

Subject: Santa Barbara County APCD Concerns with the Air Toxics "Hot Spots" (AB 2588) Fee Regulation

Dear Mr. Boyd:

The Santa Barbara County Air Pollution Control District (SBAPCD), would like to take this opportunity to express our concern about several facets of the Air Toxics "Hot Spots" (AB 2588) Fee Regulation proposed for fiscal year 1993/1994. The proposed Fee Regulation has radically departed from methods used in previous years to calculate district shares of state costs and individual facility fees within the districts. While a change in the fee structure is necessary due to the requirements of SB 1378, the SBAPCD believes that the complexity of the regulation and the proposed increase in state costs results in a Fee Regulation that will be difficult to implement if adopted by your Board.

Through the proposed revisions to the Criteria and Guidelines Regulation (CGR), your staff has been extremely responsive to business concerns by proposing significant changes to the biennial update requirements for facilities subject to the "Hot Spots" law. These proposed reductions should translate into considerable savings for both the business community and ARB/OEHHA. Unfortunately, the proposed 93/94 Fee Regulation does not introduce any fee reductions commensurate with this decrease in workload. In fact, a 62% increase in state costs is proposed. As I am sure you can appreciate, it will be difficult to justify this increase in costs in light of program streamlining per the proposed CGR revisions.

The business community will likely be concerned with the increase in state fees and the redistribution of fees from large to smaller facilities. In addition, the complexity of the proposed Fee Regulation will likely result in a legitimate request for simplification. At the local level, the SBAPCD has invested considerable effort developing an efficient and thus less costly "Hot Spots" program by promoting reporting consistency, managing data via computer automation, and performing tasks such as risk assessments for local business. Our effort has been rewarded by

26 Castilian Drive B-23, Goleta, CA 93117 Fax: 805-961-8801 Phone: 805-961-8800
James M. Ryerson, Air Pollution Control Officer William A. Master, Assistant Director

a 50% reduction in local program costs over the last two years. However, based on the proposed Fee Regulation, the state allocation of fiscal year 1993/94 program costs for Santa Barbara County will increase substantially. We realize that this increase is partly due to implementation of SB 1731 requirements and new methods for allocating state costs among the districts. However, it does not explain the significant increase in the state's overall projected budget for the "Hot Spots" program or consider the fact that the consistent reporting format of SBAPCD submittals reduces work effort at the state level. We strongly believe that our reporting consistency directly benefits the state by reducing time required by ARB and OEHHA staff to review SBAPCD submittals. State costs should certainly be lower for districts that provide consistent and complete documents to the state for review.

In these uncertain economic times, the SBAPCD has managed to lower costs for implementation and oversight of the "Hot Spots" program. We look to the Air Resources Board to scrutinize the proposed fee regulation and to consider changes which:

- Preclude controversial increases in the state budget for the "Hot Spots" program at a time when districts are working diligently to reduce costs to the business community;
- Result in a state budget which reflects a reduction in work effort commensurate with the proposed revisions to the CGR;
- Devise an allocation method for state costs which considers efforts by local districts to provide the state with complete and consistent documents;
- Equitably distribute program costs among local businesses consistent with the requirements of SB 1378.

Please do not hesitate to contact me if you would like to discuss any of the issues raised in this letter. Thank you for your attention to this matter.

Sincerely,

James M. Ryerson
Air Pollution Control Officer

cc: Mike Stoker, 5th District, Chair
Naomi L. Schwartz, 1st District, Vice Chair
Tom Rogers, 2nd District
Willy Chamberlain, 3rd District
Timothy J. Staffel, 4th District
Genevieve Shiroma, ARB
Janette Brooks, ARB
George Alexeeff, OEHHA
PLN Chron File

South Coast
AIR QUALITY MANAGEMENT DISTRICT
21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2000

May 24, 1993

Genevieve Shiroma
Air Resources Board
SSD/TACI
P.O. Box 2815
Sacramento, CA 95814

Subject: AB2588 Industrywide Inventory and E-II Facilities Fees

Dear Ms. Shiroma:

At the request of your staff, I am sending this justification for changing the South Coast AQMD AB2588 Industrywide Inventory and E-II facilities fees for Fiscal Year 93-94. The South Coast District proposes that the fee for industrywide inventory and E-II facilities be reduced from $100 per facility down to $25 per facility for a number of reasons. The main reason for a fee reduction is that the District wishes to minimize, to the extent practical, fees for small businesses such as those covered by the industrywide inventory program. As you are aware, the District program was initiated in 1989 and we have initiated inventory development for 13 classes of business. Although we will need to update emissions information for some facility types due to compliance with air toxics control measures, we anticipate that District efforts in industrywide inventory development will be reduced from what it has been over the past 4 years. Over the next two years, the District will be focusing on updating inventories and on developing industrywide risk assessments.

In addition to a reduction in the amount of cost associated with the inventory component of the program, there are a greater number of facilities classified as industrywide. Because the cost of the industrywide program can be spread over a larger number of facilities, we are requesting to reduce the fee per facility.

If you have any further questions regarding this issue, please call me at (909) 396-2662.

Sincerely,

Mohsen Nazemi
Senior Manager, Air Toxics
Office of Stationary Source Compliance

cc: Pat Leyden
Rick Pearce
Janette Brooks, ARB

(mn-gs524)

DAVID FAULKNER
Air Pollution Control Officer
PHILIP W. TOWLE
Air Pollution Control Inspector

OFFICE LOCATION:
306 East Gobbi Street
Ukiah, California
(707) 463-4354

COUNTY OF MENDOCINO
AIR QUALITY MANAGEMENT DISTRICT
COURTHOUSE
UKIAH, CALIFORNIA 95482

May 25, 1993

Janette Brooks, Manager
Special Projects Section
Stationary Source Division
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Subject: Corrections to letter of April 1, 1993

Dear Janette:

On April 1, 1993, I sent you a letter transmitting the District's estimated costs for the Hot Spots program for fiscal year 93-94. Roger Korenberg has called my attention to the need for two corrections to that letter. The errors are in the transmittal letter, and not in the approved costs.

First, the date at the top of the letter should have read April 1, 1993, not 1992.

Second, the letter should have referred to transmittal of the District's costs for fiscal year 93-94, not 92-93.

Computers have made our jobs much easier, and have opened up new ways to make mistakes. In this case, the errors arose out of copying last year's letter into a new file and not editing carefully enough. I hope this has caused you or your staff no inconvenience.

Thank you. Please call me at ATSS 8-553-4354 if you have questions.

Sincerely,

David Faulkner
Air Quality Management Officer

attachments

Fax

Attachment 1
FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

District: Mendocino

Total number of facilities designated by the district by April 1, 1993, as being in the respective program categories, except for Risk Assessment-State categories. Risk Assessment-State numbers are those risk assessments submitted to OEHHA from April 1, 1992 through March 31, 1993. Numbers do not include facilities completing a one-time survey or included in an industrywide inventory.

Program Category	ARB Count	District Count	Small Business
Plan and Report, SCC 1 & 2	7	10	
Plan and Report, SCC 3 - 5	6	4	
Plan and Report, SCC >5	4	0	
Risk Assessment-District, SCC 1&2	1	0	
Risk Assessment-State, SCC 1 & 2			
Risk Assessment-District, SCC 3-5		1	
Risk Assessment-State, SCC 3-5			
Risk Assessment-District, SCC >5	1	1	
Risk Assessment-State, SCC >5			
Notification			
Audit and Plan			

Verified by:

Name: _____

Phone: _____

Mail to: Roger Korenberg
Air Resources Board/SSD
P.O. Box 2815
Sacramento, CA 95812

FAX number: (916) 327-5621

DAVID FAULKNER
Air Pollution Control Officer
PHILIP W. TOWLE
Air Pollution Control Inspector

OFFICE LOCATION:
306 East Gobbi Street
Ukiah, California
(707) 463-4384

COUNTY OF MENDOCINO
AIR QUALITY MANAGEMENT DISTRICT
COURTHOUSE
UKIAH, CALIFORNIA 95482

FAX: (707) 463-5707

DATE: May 27, 1993

NUMBER OF PAGES INCLUDING COVER: 4/1

TO: Roger Korenberg
ARB

FAX #: 8/467-5621

FROM: David Faulkner
Mendocino Co. AQMD

MESSAGE: Recount indicates error in recent transmittal. List of sources in each category attached.

B^D\FAX-FORM

Attachment 1
FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

District: Mendocino

Total number of facilities designated by the district by April 1, 1993, as being in the respective program categories, except for Risk Assessment-State categories. Risk Assessment-State numbers are those risk assessments submitted to OEHHA from April 1, 1992 through March 31, 1993. Numbers do not include facilities completing a one-time survey or included in an industrywide inventory.

Program Category	ARB Count	District Count	Small Business
Plan and Report, SCC 1 & 2	7	9	?
Plan and Report, SCC 3 - 5	6	4	?
Plan and Report, SCC >5	4	0	
Risk Assessment-District, SCC 1&2	1	0	
Risk Assessment-State, SCC 1 & 2			
Risk Assessment-District, SCC 3-5		1	0
Risk Assessment-State, SCC 3-5			
Risk Assessment-District, SCC >5	1	1	0
Risk Assessment-State, SCC >5			
Notification			
Audit and Plan			

Verified by:

Name: _____

Phone: _____

Mail to: Roger Koronberg
Air Resources Board/SSD
P.O. Box 2815
Sacramento, CA 95812

FAX number: (916) 327-5621

Risk Assessment - Dist. SCC >5

1. Masonite Corp.

Risk Assessment - Dist SCC 3-5

1. Georgia Pacific

Plan & Report. SCC 3-5

1. Renco Hydraulics

2. Parnum Paving

3. Boxman Gravel

4. ~~[illegible]~~ G-P Resins

Plan & Report SCC 1-2

1. Auker Lucier Mortuary

2. Eversole Mortuary

3. Howard Hospital

4. Performance Coatings

5. Retech Industries

6. Rose Memorial Park

7. Ukiah Valley Med. Ctr. (Hospital Dr.)

8. Ukiah Valley Med. Ctr. (Dora St.)

9. Thanksgiving Coffee

CALPINE

P.O. BOX 11279
SANTA ROSA, CALIFORNIA 95406-12
707.527.6700
707.544.2422 (fax)

(3)

May 28, 1993

Mr. Roger Korenberg
California Air Resources Board
2020 L Street
Sacramento, CA 95812

Dear Mr. Korenberg:

As a participant in the geothermal industry at The Geysers in northern California I have followed the proposed amendments to the Air Toxics "Hot Spots" Fee Regulation for the fiscal year 1993-1994. Discussions with the Lake County Air Quality Management District and the North Sonoma County Air Pollution Control District and attendance at workshops leads me to strongly support the proposed fee structure.

I appreciate the time the ARB has put into revising the fee structure and the importance of transferring the costs of this program to the businesses in the state that are "Hot Spots". I also support the changes being made to streamline the reporting procedures for those facilities that do not trigger risk assessment and/or have had no change in their process streams.

Please call me at 707-527-6700 if you need more information about the impact of this regulation on the geothermal industry. Again, thank you for your efforts on these proposed amendments.

Sincerely,

Charlene L. Wardlow

Charlene L. Wardlow
Environmental Manager

cc: Sean Connolly, NSCAPCD
Robert Reynolds, LCAQMD

CLW:clw\CLW\AB2588.FEE

COAST ROCK CONCRETE PRODUCTS INC.

P.O. BOX 5050, SANTA MARIA, CA 93456
GEN. OFFICE: 1625 E. DONOVAN ROAD
PHONE: (805) 925-2505

Coast Rock PRODUCTS, Inc.

May 28, 1993

Genevieve Shiroma, Chief
Toxic Air Contaminant Identification Branch
Stationary Source Division
P. O. Box 2815
Sacramento, CA 95812

Re: Comments on Proposed Changes to Hot Spot Fees

Dear Ms. Shiroma:

As a small business trying to continue operations in California, it seems that our fees are becoming higher and levied more frequently all the time. The fee increase your department proposed on March 29, 1993, is astounding to say the least.

We have operated a family-owned business in Santa Barbara County since 1957. One of our competitors, Buellflat Rock Company, has just announced it will shut its asphalt plant down on June 20 and its rock plant soon thereafter. We are concerned that if our fees don't become more reasonable we may suffer the same fate. We cannot continue to absorb such tremendously high fees. Our local APCD is one of the toughest in the State. We do our best to comply with all regulations. Could you please reconsider your proposed fee schedule and make it more reasonable in light of what is happening economically in California.

Thank you for your time. If you have any questions, please call me at (805)922-9858.

Sincerely yours,

COAST ROCK PRODUCTS, INC.

Bob Kober

Bob Kober

BK/bw

AIR POLLUTION
CONTROL DISTRICT
COUNTY OF SAN LUIS OBISPO

June 2, 1993

Roger Korenberg
Air Resources Board
Special Projects Section
P.O. Box 2815
Sacramento, California 95812

SUBJECT: List of Sources Subject to the Air Toxics Hot Spots Program

Dear Mr. Korenberg:

In response to your telephone request of May 11, 1993, I am enclosing a list of facilities that are required to submit toxic emission inventory plans and reports, health risk assessments, and/or are required to notify the public. All three phases of the ATHS program are included in this listing. Note that phase three facilities included in the industry-wide emissions inventory to be provided by the District and facilities required to complete questionnaires have been omitted, per your request.

The evaluation of phase three TEIRs is not complete. Therefore, it is not known if any health risk assessments will be required. However, because most of the sources are small, it is unlikely that an HRA or public notification will be needed.

If you have any questions regarding this matter, you may contact me at the District office Monday through Thursday, 8 a.m. to 5 p.m. at (805) 781-5912.

Respectfully,

Tom Roemer
Air Pollution Control Engineer

TR/cah
Enclosures

toxics\rkarb.TOM

2156 Sierra Way, Suite B • San Luis Obispo, CA 93401 • 805·781·5912 • FAX: 805 781·1035

FILE: h:\engineer\tom\lotus\arbsum1.wk3

SAN LUIS OBISPO COUNTY AIR POLLUTION CONTROL DISTRICT

LIST OF SOURCES FOR THE AIR TOXICS HOT SPOTS PROGRAM

ID#	BUSINESS NAME	TEIP/R	HRA	NOTIFICATION
	FIRST YEAR SOURCES/FACILITIES:			
58	CHEVRON ESTERO BAY	YES	YES	MAYBE
74	PGE DIABLO CANYON	YES	NO	NO
8	PGE MORRO BAY	YES	YES	NO
6	SP MILLING QUARRY/ASPHALT PLANT	YES	NO	NO
905	SURGITEK	OUT OF BUSINESS		
43	SWEPI	YES	YES	NO
15	UNION ASPHALT ASPHALT PLANT	YES	NO	NO
84	UNION ASPHALT QUARRY	YES	NO	NO
34	UNOCAL AVILA PUMP STATION	YES	NO	NO
4	UNOCAL CHEMICALS DIVISION	YES	YES	NO
11	UNOCAL GUADALUPE OIL FIELD	YES	NO	NO
36	UNOCAL SANTA MARGARITA PUMP STA	YES	NO	NO
13	UNOCAL SANTA MARIA REFINERY	YES	YES	NO
44	WEST AMERICAN RESOURCES	YES	NO	NO
	SECOND YEAR SOURCES/FACILITIES:			
76	CALIFORNIA MEN'S COLONY	YES	YES	NO
24	CALIFORNIA POLYTECHNIC UNIVERSITY	YES	YES	NO
317	CHEVRON SHANDON PUMP STATION	YES	NO	NO
45	E.C. LOOMIS & SONS	OUT OF BUSINESS		
301	FAILSAFE FIBERGLASS	YES	YES	NO
354	JBL SCIENTIFIC, INC.	YES	YES	NO
22	POULTRYMEN'S CO-OP ASSOC.	DROPPED FROM PROGRAM		
61	S.P. MILLING ATASCADERO CONCRETE	YES	NO	NO
20	TRUSCO TANK, INC.	YES	NO	NO
35	UNOCAL SHANDON PUMP STATION	YES	NO	NO
	THIRD YEAR SOURCES/FACILITIES			
GENERAL:				
339	CROWN PLATING OF CALIFORNIA	YES	UNKOWN	DOUBTFUL
67	AMI SIERRA VISTA MEDICAL	YES	UNKOWN	DOUBTFUL
121	ARROYO GRANDE COMM. HOSPITAL	YES	UNKOWN	DOUBTFUL
393	FRENCH HOSPITAL MEDICAL CENTER	YES	UNKOWN	DOUBTFUL
n/a	TWIN CITIES COMMUNITY HOS	YES	UNKOWN	DOUBTFUL
75	ATASCADERO STATE HOSPITAL	YES	UNKOWN	DOUBTFUL
902	CAMP SAN LUIS	YES	UNKOWN	DOUBTFUL
n/a	HEADQUARTERS CAMP ROBERTS	YES	UNKOWN	DOUBTFUL
3	CHEMRON CORP.	YES	UNKOWN	DOUBTFUL
n/a	SPECIALTY SILICONE FABRIC.	YES	UNKOWN	DOUBTFUL
328	BAILEY BRIDGES	YES	UNKOWN	DOUBTFUL
99	CALIFORNIA FINE WIRE	YES	UNKOWN	DOUBTFUL
5	SUNBANK ELECTRONICS	YES	UNKOWN	DOUBTFUL
338	WEST COAST INDUSTRIAL	YES	UNKOWN	DOUBTFUL
n/a	CITY OF SLO WWTF	YES	UNKOWN	DOUBTFUL
394	PASO ROBLES WWTP	YES	UNKOWN	DOUBTFUL
996	SOUTH SLOC SD	YES	UNKOWN	DOUBTFUL
31	ARROYO VALLEY CREMATORY	YES	UNKOWN	DOUBTFUL
68	BENEDICT-RETTY CREMATORY	YES	UNKOWN	DOUBTFUL
30	CHAPEL OF THE ROSES	YES	UNKOWN	DOUBTFUL
29	LOS OSOS VALLEY MEMORIAL PARK	YES	UNKOWN	DOUBTFUL

347	OAK HILLS MEM. PET CARE	YES	UNKOWN	DOUBTFUL
32	WOODS HUMANE SOCIETY	YES	UNKOWN	DOUBTFUL

BODYSHOPS:

468	AMERICAN AUTO BODY	YES	DOUBTFUL	DOUBTFUL
467	ARP'S AUTOBODY	YES	DOUBTFUL	DOUBTFUL
403	AUTOBODY BLDRS/MORRO BAY	YES	DOUBTFUL	DOUBTFUL
421	AUTOMOTION AUTOBODY	YES	DOUBTFUL	DOUBTFUL
404	B & B BODY SHOP	YES	DOUBTFUL	DOUBTFUL
470	BRANCH AUTOBODY	YES	DOUBTFUL	DOUBTFUL
391	CAMBRIA AUTO RESTORATION	YES	DOUBTFUL	DOUBTFUL
408	CLASSIC COACH WERKS	YES	DOUBTFUL	DOUBTFUL
409	COLOR GLO	YES	DOUBTFUL	DOUBTFUL
405	CROCKETT AUTO BODY	YES	DOUBTFUL	DOUBTFUL
483	DAVIS AUTO BODY NORTH	YES	DOUBTFUL	DOUBTFUL
415	DAVIS BODY SHOP	YES	DOUBTFUL	DOUBTFUL
414	HIGUERA AUTO BODY	YES	DOUBTFUL	DOUBTFUL
419	HOADLEY'S AUTOMOTIVE	YES	DOUBTFUL	DOUBTFUL
443	HUNTER AUTO BODY	YES	DOUBTFUL	DOUBTFUL
420	HYSEN-JOHNSON FORD	YES	DOUBTFUL	DOUBTFUL
n/a	JEFFERIS AUTO BODY	YES	DOUBTFUL	DOUBTFUL
464	JOHNSTON'S AUTO BODY/PAINT	YES	DOUBTFUL	DOUBTFUL
422	KEN'S BODY SHOP	YES	DOUBTFUL	DOUBTFUL
423	KENT'S AUTO BODY	YES	DOUBTFUL	DOUBTFUL
n/a	LARSON'S AUTO BODY	YES	DOUBTFUL	DOUBTFUL
n/a	LOS OSOS AUTO BODY	YES	DOUBTFUL	DOUBTFUL
426	MORRO BAY BODY/PAINT	YES	DOUBTFUL	DOUBTFUL
472	MORRO OAKS CARRIAGE WORKS	YES	DOUBTFUL	DOUBTFUL
427	NUNES PRISTINE AUTO BODY	YES	DOUBTFUL	DOUBTFUL
429	OTIS AUTO BODY	YES	DOUBTFUL	DOUBTFUL
431	PASO ROBLES DIESEL SERV.	YES	DOUBTFUL	DOUBTFUL
n/a	PELLETT'S AUTO BODY	YES	DOUBTFUL	DOUBTFUL
466	PISMO COAST PAINT BOOTH R.	YES	DOUBTFUL	DOUBTFUL
433	PRECISION COLLISION	YES	DOUBTFUL	DOUBTFUL
437	QUALITY AUTO BODY	YES	DOUBTFUL	DOUBTFUL
454	RAINBOW AUTO PAINTING/BODY	YES	DOUBTFUL	DOUBTFUL
447	RAINBOW MARINE/AUTO PAINT.	YES	DOUBTFUL	DOUBTFUL
435	RIVERA'S BODY/PAINT SHOP	YES	DOUBTFUL	DOUBTFUL
436	ROD'S AUTO BODY	YES	DOUBTFUL	DOUBTFUL
471	SAN LUIS AUTOBODY	YES	DOUBTFUL	DOUBTFUL
469	SAN LUIS CUSTOMS	YES	DOUBTFUL	DOUBTFUL
438	SIERRA BODY SHOP	YES	DOUBTFUL	DOUBTFUL
439	STANDARD MOTORS	YES	DOUBTFUL	DOUBTFUL
440	SUNSET HONDA	YES	DOUBTFUL	DOUBTFUL
448	THE BODYMAN	YES	DOUBTFUL	DOUBTFUL
451	VICK PACE FORD	YES	DOUBTFUL	DOUBTFUL
450	VINTAGE AUTOBODY	YES	DOUBTFUL	DOUBTFUL

This list does not contain industry-wide sources such as dry cleaners or gasoline stations.
This list does not contain Phase Three sources appearing on the E-II list.
UNKNOWN = Reports have not yet been evaluated. It is not known if an HRA will be required but it is unlikely based on knowledge of the source.
DOUBTFUL = Staff's best estimate that a facility will not be required to submitt an HRA or to notify the public.
n/a = Facility number not yet assigned.

Santa Barbara County
Air Pollution Control District

FAX TRANSMITTAL

MEMORANDUM

TO: Carla Takemoto, ARB

FROM: Rich Stedman, APCD RS

DATE: June 3, 1993

SUBJECT: AB 2588 Facility Count/SCC Numbers

Thank you for the FAX you sent to me this morning concerning Source Classification Codes (SCCs) for facilities subject to the AB 2588 Fee Regulation in Santa Barbara County. I have filled in the number of SCCs for all facilities where data were absent. Please be advised that SCCs for some of the facilities (especially Phase III) may be estimated since they may have only submitted a Plan or Report to the District without these data. Also, I've included an additional facility, SP Milling-Lompoc, in the Plan and Report category along with their FID number and number of SCCs. Please disregard facility fee information contained in the tables.

With regard to the Falkenhagen-represented facilities, all data submitted for review is correct.

Please call me at (805) 961-8916 if you have any questions regarding this FAX.

cc: PLN Chron File

26 Castilian Drive B-23, Goleta, CA 93117 Fax: 805-961-8801 Phone: 805-961-8800
James M. Ryerson, Air Pollution Control Officer William A. Minter, Assistant Director

Our Vision: Clean Air

Santa Barbara County APCD
"Hot Spots" Fee Comparisons
June 1, 1993

Phase I	FY 92/93 Fee	FY 93/94 Fee	FID	SCC No.
ARCO - Dos Pueblos	[illegible]	[illegible]	[illegible]	[illegible]
ARCO - Ellwood Beach	[illegible]	[illegible]	[illegible]	[illegible]
ARCO - Oil & Gas	[illegible]	[illegible]	[illegible]	[illegible]
ARCO - Holly	[illegible]	[illegible]	[illegible]	[illegible]
Guard Rock	[illegible]	[illegible]	[illegible]	[illegible]
Celite	[illegible]	[illegible]	[illegible]	[illegible]
Chevron - California	[illegible]	[illegible]	[illegible]	[illegible]
Chevron - Davis	[illegible]	[illegible]	[illegible]	[illegible]
Coast Rock	[illegible]	[illegible]	[illegible]	[illegible]
Cogen Topical	[illegible]	[illegible]	[illegible]	[illegible]
Unocal	[illegible]	[illegible]	[illegible]	[illegible]
Firma Air Purifier	[illegible]	[illegible]	[illegible]	[illegible]
Gas Plant	[illegible]	[illegible]	[illegible]	[illegible]
Holly Sprague	[illegible]	[illegible]	[illegible]	[illegible]
Lompoc WWTP	[illegible]	[illegible]	[illegible]	[illegible]
McGuire Morgan	[illegible]	[illegible]	[illegible]	[illegible]
Mentor	[illegible]	[illegible]	[illegible]	[illegible]
POPLOC	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
SBRC Build. 6	[illegible]	[illegible]	[illegible]	[illegible]
SBRC Build. 21	[illegible]	[illegible]	[illegible]	[illegible]
SBRC Build. 35	[illegible]	[illegible]	[illegible]	[illegible]
SBRC Holiday	[illegible]	[illegible]	[illegible]	[illegible]
Shell - Carpinteria	[illegible]	[illegible]	[illegible]	[illegible]
Shell El Capitan	[illegible]	[illegible]	[illegible]	[illegible]
Shell Santa Maria	[illegible]	[illegible]	[illegible]	[illegible]
SP Cal Gas Gaviota	[illegible]	[illegible]	[illegible]	[illegible]
SP Cal Gas Gaviota	[illegible]	[illegible]	[illegible]	[illegible]
Hexcel	[illegible]	[illegible]	[illegible]	[illegible]
Texaco - Cat Canyon	[illegible]	[illegible]	[illegible]	[illegible]
Texaco - Kern	[illegible]	[illegible]	[illegible]	[illegible]
UCSB	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Gaviota	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Foster Park	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Clemens	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Cat Canyon	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Cat Canyon	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Elm Hollow	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Jim Hybird	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Orcutt	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Orcutt	[illegible]	[illegible]	[illegible]	[illegible]
Unocal Santa Maria	[illegible]	[illegible]	[illegible]	[illegible]
Vandenberg AFB*	4433	5080	201	7
West Allen Helicopter	[illegible]	[illegible]	[illegible]	[illegible]

Phase II	FY 92/93 Fee	FY 93/94 Fee	FID	SCC No.
Exxon Gaviota	[illegible]	[illegible]	[illegible]	[illegible]
Lompoc [illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Texaco - Mt Cat Can.	[illegible]	[illegible]	[illegible]	[illegible]
Cabot	[illegible]	[illegible]	[illegible]	[illegible]
Aluminum Fibre	[illegible]	[illegible]	[illegible]	[illegible]
Bee Rock	[illegible]	[illegible]	[illegible]	[illegible]
Pacific Lumber	[illegible]	[illegible]	[illegible]	[illegible]
Union Pacific	[illegible]	[illegible]	[illegible]	[illegible]
Granite [illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Lucky Santa Maria	[illegible]	[illegible]	[illegible]	[illegible]
Chevron - Elwood	[illegible]	[illegible]	[illegible]	[illegible]
Texaco - Orcutt	[illegible]	[illegible]	[illegible]	[illegible]
Bolthouse Foods	[illegible]	[illegible]	[illegible]	[illegible]
Gas Plant [illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Hancock Oil	[illegible]	[illegible]	[illegible]	[illegible]
SP Milling - Orcutta	[illegible]	[illegible]	[illegible]	[illegible]
ARCO - Solvang	[illegible]	[illegible]	[illegible]	[illegible]
Andre Automotive	[illegible]	[illegible]	[illegible]	[illegible]
Chevron - Union Bright	[illegible]	[illegible]	[illegible]	[illegible]
Texaco - Orcutt	[illegible]	[illegible]	[illegible]	[illegible]
Dectone*	800	749	1440	2
Cal-Mat Goleta*	800	749	1246	1
Cal-Mat SB*	800	749	1249	2
Cal-Compack Foods*	800	749	3832	2
SP Milling Santa Maria*	800	749	3895	2
Texaco GTO*	800	1535	4007	4

Category	Number
Risk Assessment	61
* Plan & Report	94
◄ Risk Assessment (State)	2

Phase III	FY 92/93 Fee	FY 93/94 Fee	FID	SCC No.
Aeroflair*	300	1535	1012	3
Applied Magnetics*	300	1535	1033	3
Applied Magnetics*	300	1535	1058	3
Applied Magnetics*	300	1535	3914	3
Applied Magnetics*	300	1535	3914a	3
Applied Magnetics*	300	1535	3914b	3
Chevron Pipeline Corp.	300	1535	4139	1
CUI Corp.*	300	1535	1413	3
ITC*	300	1535	1534	2
Joslyn Electronics*	300	1535	1649	3
Raytheon*	300	1535	1971	3
Raytheon*	300	1535	3526	3
Cottage Hospital*	300	1535	2020	4
SP Milling Goleta*	300	1535	20	1
3M Vision Care*	300	1535	2918	2
USN Missile Test Ctr*	300	1535	3961	3
SP Milling Lompoc*	800	749	2418	2

VICTOR J. MAGISTRALE
207 OAKLAWN AVENUE
SOUTH PASADENA, CALIFORNIA 91030 U.S.A.
(818) 799-2287

93-8-2
7/8/93

4 June 1993

Board Secretary
Air Resources Board
P.O. Box 2815
Sacramento, Ca 95817

XC: Bd Mbrs
JS MHS
JD SSD
JB Legal

Sir/Mesdames:

I submit these comments for the Air Toxics Hot-Spots Fee Regulation. The Board is to consider this regulation July 8, 1993 at 9:30 AM. My comments follow.

I commend the Board in taking this important action to reduce poisonous gases into the atmosphere of California.

The regulation should be entitled Poison Gas Reduction Regulation.

Neither private or public organizations should be exempt from the Regulation. All organizations should pay fees for the institution and installation of this important regulation. Public organizations including non profit organizations should be honored to pay small fees to improve the health of the people of California.

Any organization that does not want to reduce poisons put into the air in California should not be welcome in this state.

Thank you for the opportunity to comment

Sincerely yours
Victor J. Magistrale, P.

AIR POLLUTION CONTROL DISTRICT
THOMAS PAXSON, P.E., Director
2700 "M" STREET, SUITE 290
BAKERSFIELD, CA 93301
Phone: (805) 861-2593
FAX: (805) 861-2595

RESOURCE MANAGEMENT AGENCY
JOEL HEINRICHS, AGENCY DIRECTOR
Air Pollution Control District
Engineering & Survey Services Department
Planning & Development Services Department
Transportation Management Department
Waste Management Department

June 14, 1993

To: Carla Takemoto
CARB
FAX (916)327-0647

From: Mary Flynn MF

Subject: **AB2588 '93-94 Fee Regulation**

Enclosed are facility names/categories you requested. The total facilities included will differ from previous totals submitted. Previously I had included all facilities completing a plan/report in the appropriate plan/report column, and if these same facilities had completed a HRA I also included them in this category assuming the fees would build upon one another. This new list includes a facility in only one category.

HRA's submitted in the 4th quarter of 1991 for which we have not received an evaluation back from OEHHA have been included in "HRA Complex District" category. Any HRA's submitted from April 1, 1992 through March 31, 1993 are included in a HRA State category, per conversation with Roger Korenberg.

Simple Plan/Report
1. Mojave POTW
2. Mojave Cogeneration Co.
3. Commodity Refining Ex.
4. Imperial West Chemical

Complex Plan/Report

1. Naval Weapons Center
2. Cal-Ci-Co Rock

HRA Complex District

1. Calaveras Cement Co.
   (sub. 10/91)
2. Chemical Milling
   (sub. 10/91)
3. Edwards AFB
   (sub. 10/91)
4. National Cement Co.
   (sub. 10/91)
5. U.S. Borax
   (sub. 10/91)

HRA Complex State

1. Cactus Gold Mines
   (sub. 7/24/92)
2. Courtaulds Aerospace
   (formerly Product Research & Chem.)
   (sub. 3/23/93)
3. Rand Mining Co.
   (sub. 7/24/92)
4. Billiton Exploration
   (sub. 7/24/92)
5. Rand Mining
   (sub. 7/24/92)
6. California Portland Cement
   (Submitted 10/16/91 but OEHHA had no record. Re-submitted 8/20/92.)
7. Asphalt Construction Co.
   (sub. 7/24/92)

HRA Intermediate State

1. Systech Environmental
   (sub. 7/24/92)

cc. Korenberg (916)327-5621

6/14 Count

Attachment 1

FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

District: Kern

Total number of facilities designated by the district by April 1, 1993, as being in the respective program categories, except for Risk Assessment-State categories. Risk Assessment-State numbers are those risk assessments submitted to OEHHA from April 1, 1992 through March 31, 1993. Numbers do not include facilities completing a one-time survey or included in an industrywide inventory.

Program Category	ARB Count	6/14 District Count	Small Business
Plan and Report, SCC 1 & 2		4	
Plan and Report, SCC 3 - 5			
Plan and Report, SCC >5		2	
Risk Assessment-District, SCC 1&2			
Risk Assessment-State, SCC 1 & 2			
Risk Assessment-District, SCC 3-5		[redacted]	
Risk Assessment-State, SCC 3-5		1	
Risk Assessment-District, SCC >5		5	
Risk Assessment-State, SCC >5		[redacted]6	
Notification			
Audit and Plan			
		18	

Verified by:

Name: Mary Flynn

Phone:

Mail to: Roger Korenberg
Air Resources Board/SSD
P.O. Box 2815
Sacramento, CA 95812

FAX number: (916) 327-5621

Lake County Air Quality Management District
883 Lakeport Blvd
Lakeport, California 95453
Phone: (707) 263-7000
Fax: (707) 263-1052

Robert L. Reynolds
Air Pollution Control Officer
John Thompson
Air Quality Engineer

June 14, 1993

Mr. Roger Korenberg
SSC Division
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Facility Count For Fiscal Year 1993-94 Fee Regulation

Dear Mr. Korenberg:

Pursuant to your request, I have reviewed the facility count figures for the revised fee regulation and have found the following (9) nine facilities applicable.

1. Northern California Power Agency (NCPA) U1-4 Steamfield
2. Santa Rosa Geothermal Company - Bear Canyon Creek Power Plant
3. Santa Rosa Geothermal Company - West Ford Flat Power Plant
4. Santa Rosa Geothermal Company - U13/U16 Steamfield
5. Pacific Gas and Electric Company (PGandE) - Unit 13 Power Plant
6. Pacific Gas and Electric Company (PGandE) - Unit 16 Power Plant
7. Santa Fe Geothermal - Santa Fe Geo I Power Plant
8. Unocal Geothermal - U11/U17 Steamfield
9. Homestake Mining Company (HMC)

Your attention to this matter and revising our estimate is appreciated. Please give Bob Reynolds or myself a call at (707) 263-7000 if you have any questions.

Sincerely,

John D. Thompson

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 1
To ROGER KORENBERG	From JOHN THOMPSON
Co. ARB	Co. LAKE COUNTY AQMD
Dept.	Phone # (707) 263-7000
Fax # 916 327-5621	Fax # (707) 263-1052

Date: June 15, 1993

To: Janette Brooks

From: Roger Korenberg RK

Subject: Yolo-Solano Facility Count

I spoke with Annette Carruthers, Yolo-Solano APCD, today regarding the number of facilities in the district to be used for calculating fees. She gave me the following numbers:

Plan and Report,	Simple	21
	Intermediate	13
	Complex	25
Risk Assessment,	District Complex	2
Total		59

This is an update from their previous numbers.

Attachment 1
FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

District: Yolo - Solano

Total number of facilities designated by the district by April 1, 1993, as being in the respective program categories, except for Risk Assessment-State categories. Risk Assessment-State numbers are those risk assessments submitted to OEHHA from April 1, 1992 through March 31, 1993. Numbers do not include facilities completing a one-time survey or included in an industrywide inventory.

5/12 RJK

Program Category	ARB Count	District Count	
Plan and Report, SCC 1 & 2	6	19	21
Plan and Report, SCC 3 - 5	10	15	13
Plan and Report, SCC >5	41	27	25
Risk Assessment-District, SCC 1&2		0	
Risk Assessment-State, SCC 1 & 2		0	
Risk Assessment-District, SCC 3-5	1	0	
Risk Assessment-State, SCC 3-5		0	
Risk Assessment-District, SCC >5	3	2	2
Risk Assessment-State, SCC >5		0	
Notification		0	
Audit and Plan		0	
	60	63	59

Verified by:
Name: Annette Carruthers
Phone: (916) 757-3659

Mail to: Roger Korenberg
Air Resources Board/SSD
P.O. Box 2815
Sacramento, CA 95812

FAX number: (916) 327-5621

updated by telcon
5/12 RJK
6/15 RJK

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To Roger Korenberg	From Annette Carruthers
Co. ARB	Co. Ys APCD
Dept. SSD	Phone # 1-757-3659
Fax # 327-5621	Fax # 1-757-3670

NORTHERN SONOMA COUNTY
AIR POLLUTION CONTROL DISTRICT

109 North Street Healdsburg CA 95448
Telephone (707) 433-5911

93-8-2
7/8/93

XC: Bd mbr
JS mHS
JD SSD
JB Legal

June 15, 1993

Board Secretary
California Air Resources Board
P.O.Box 2815
Sacramento, CA 95812

RE: Amendments to the Air Toxics Hot Spots Fee Regulation for 1993-94

Dear Board Secretary:

The Northern Sonoma County Air Pollution Control District, as a member of the Fee Regulation Committee, has participated in the development of the amendments to the Fee Regulation being brought before the Board for your consideration. The District can appreciate the enormous time and effort your staff has put into this process.

The District strongly supports the changes being proposed to the Fee Regulation. The District believes the proposed fee structure recognizes the number and complexity of facilities our District has in the various Hot Spots Program categories. It directly reflects our workload and the priority of the facilities being inventoried.

Sincerely,

Michael W. Tolmasoff
Air Pollution Control Officer

MWT/SC/sc
s:\corresp\feesupp\sc

MPERIAL COUNTY AB2588 FACILITY LIST JUNE 16, 1993

FACILITY NAME	FAC. ID	PLAN IN	REP.IN	HRA REQ'D
GOLD FIELDS OPER. CO.	46	Y	Y	N
PLANTER'S GIN CO.	17	Y	Y	N
RED HILL GEOTHERMAL				
VULCAN PLANT	44	Y	Y	N
LEATHERS PLANT	51	Y	Y	N
ELMORE PLANT	49	Y	Y	N
DEL RANCH PLANT	50	Y	Y	N
MPERIAL IRRIGATION DIST.				
EL CENTRO STEAM PLANT	15	Y	Y	Y
PSC GEOTHERMAL				
ORMESA 1 PLANT	49	Y	Y	N
ORMESA 1E PLANT	50	Y	Y	N
ORMESA 1H PLANT	51	Y	Y	N
CHEMGOLD PICACHO MINE	63	Y	Y	N
HOLLY SUGAR	10	Y	Y	N
UNOCAL CORP GEOTHERMAL				
UNOCAL OFFICES	73	Y	Y	N
EARTH ENERGY INC.	45	Y	Y	N
DESERT POWER CO.	72	Y	Y	N
UNOCAL UNITS 1&2	71	Y	Y	N
ANTA FE PACIFIC PIPE LIN	39	Y	Y	N
MESQUITE LAKE RESOURCE				
RECOVERY PROJECT	47	Y	Y	N
GEO EAST MESA	53	Y	Y	N
VAL ROCK	18	Y	Y	N
HEBER GEOTHERMAL	43	Y	Y	Y
LAIDLAW ENV. SERVICES	70	Y	Y	N
PLANTERS GIN CO.	41	Y	Y	N
AMERICAN GIRL MINING CO.	54	Y	Y	N
S. T. SERVICES	48	Y	Y	N
GRANITE CONSTRUCTION CO.				
FRINK FACILITY	55	Y	N	
EL CENTRO FACILITY	24	Y	N	
U.S. GYPSUM	21	Y	DUE 7/93	
WILBUR ELLIS CO.	42	N	N	
ESERT ALFALFA MILLS INC.	11	N	N	

Attachment 1

FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

District: Imperial

Total number of facilities designated by the district by April 1, 1993, as being in the respective program categories, except for Risk Assessment-State categories. Risk Assessment-State numbers are those risk assessments submitted to OEHHA from April 1, 1992 through March 31, 1993. Numbers do not include facilities completing a one-time survey or included in an industrywide inventory.

Program Category	6/16 ARB Count	District Count	Small Business
Plan and Report, SCC 1 & 2	22		
Plan and Report, SCC 3 - 5	2		
Plan and Report, SCC >5	4		
Risk Assessment-District, SCC 1&2			
Risk Assessment-State, SCC 1 & 2			
Risk Assessment-District, SCC 3-5	2		
Risk Assessment-State, SCC 3-5			
Risk Assessment-District, SCC >5			
Risk Assessment-State, SCC >5			
Notification			
Audit and Plan			
	30		

Verified by:

Name: telcon w/ Bob Fisher

~~Phone:~~ 6/16 Roger J Korenberg

Mail to: Roger Korenberg
Air Resources Board/SSD
P.O. Box 2815
Sacramento, CA 95812

FAX number: (916) 327-5621

Date: June 16, 1993

To: Roger Korenberg

From: Carla Takemoto

Subject: Sacramento AQMD Facility Information

I spoke with Karen Kelly of the Sacramento AQMD regarding SCC counts for three risk assessment facilities in their district. These are state risk assessments which were submitted to the OEHHA in February 1993.

The information is as follows:

Folsom Prison (Prison Industries): 7 SCCs
Santa Fe Pacific Pipeline: 1 SCC
Grafil Inc.: 2 SCCs

From this information, 2 of these facilities would be risk assessment-state (simple) and one would be risk assessment-state (complex).

Santa Barbara County
Air Pollution Control District

Date 6/17/93

Time

Please deliver the following pages to:

Name: ROGER KORENBERG

Company: ARB / SSD

Location: SACTO

FAX No: (916) 327-5621

Total Pages Including This Page: 2

Call to confirm this transmittal? Yes [ ] No [X]

From: RICH STEDMAN

Division: PLANNING

Senders Phone: (805) 961-8916

Subject: ATTACHMENT 1, FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

[X] Original will not follow

[ ] Original will follow by:
- [ ] US Mail
- [ ] Overnight Service
- [ ] Federal Express

Inter-office [ ]
Other [ ]

Message:

26 Castilian Drive B-23, Goleta, CA 93117 Fax: 805-961-8801 Phone: 805-961-8800
James M. Ryerson, Air Pollution Control Officer William A. Master, Assistant Director

cc: Planning Chron File

H:\USER\PLAN\RDV\WP\FAX\OVER

RECEIVED

JUN 16 1993

SB CO. APCD

Attachment 1
FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

District: Santa Barbara

Total number of facilities designated by the district by April 1, 1993, as being in the respective program categories, except for Risk Assessment-State categories. Risk Assessment-State numbers are those risk assessments submitted to OEHHA from April 1, 1992 through March 31, 1993. Numbers do not include facilities completing a one-time survey or included in an industrywide inventory.

Program Category	ARB Count	District Count	Small Business
Plan and Report, SCC 1 & 2	1	1	
Plan and Report, SCC 3 - 5	12	12	
Plan and Report, SCC >5	20	20	
Risk Assessment-District, SCC 1&2	17	17	
Risk Assessment-State, SCC 1 & 2	1	1	
Risk Assessment-District, SCC 3-5	19	19	
Risk Assessment-State, SCC 3-5			
Risk Assessment-District, SCC >5	16	16	
Risk Assessment-State, SCC >5	1	1	
Notification			
Audit and Plan			

Verified by:

Name: Rich Stedman

Phone: 961-8916 (805)

Date: 6/17/93

Mail to: Roger Korenberg
Air Resources Board/SSD
P.O. Box 2815
Sacramento, CA 95812

FAX number: (916) 327-5621

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To Rich Stedman	From Roger Korenberg
Co. Santa Barbara	Co. ARB
Dept. Air Pollution	Phone # 327-5634
Fax # 961-8801	Fax #

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 6-22-93

San Joaquin Valley
Unified Air Pollution Control District

93-8-2
7/8/93

XC: ~~Bd~~ ~~mbr~~
JS ~~mHS~~
JD ~~SSD~~
JB ~~Legal~~

David L. Crow
Executive Director/
Air Pollution
Control Officer
1999 Tuolumne Street, Suite #200
Fresno, CA 93721
(209) 497-1000
Fax (209) 233-2057

Northern Region
4230 Kiernan Avenue, Suite #130
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1999 Tuolumne Street, Suite #200
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(209) 497-1000
Fax (209) 233-2057

Southern Region
2700 M Street, Suite #275
Bakersfield, CA 93301
(805) 861-3682
Fax (805) 861-2060

June 21, 1993

Ms. Jananne Sharpless, Chairperson
California Air Resources Board
2020 "L" Street
Sacramento, California 95814

X.C. Don
Genevieve
Janette

R.O.
We and OEHHA will need to be prepared to respond to each pt. at our Bd. Hearing.

RE: CARB Toxic "Hot Spots" Proposed 1993-94 Budget

Dear Ms. Sharpless:

In March our District Board was approached by several industry representatives expressing their concern over proposed increases in the State's proposed cost for Hot Spots Program. Our Board directed District staff to work with industry and CARB to determine if reductions could be offered for CARB's consideration.

On June 17th, our Board received the attached analysis and recommends it for your Board's consideration.

We, and industry appreciate the substantial reductions already proposed, but want to make sure you have the benefit of additional savings that are highlighted in our analysis.

Thank you for your consideration.

Sincerely,

David L. Crow
Executive Director/APCO

DC/ls
Attachment

San Joaquin Valley
Unified Air Pollution Control District

David L. Crow
Executive Director/
Air Pollution
Control Officer
1999 Tuolumne Street, Suite #200
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Fax (209) 233-2057

Southern Region
2700 M Street, Suite #275
Bakersfield, CA 93301
(805) 861-3682
Fax (805) 861-2060

TO: SJVUAPCD Governing Board

FROM: David L. Crow, Executive Director/APCO MB for

REGARDING: REPORT ON DEVELOPMENT OF STATE TOXIC "HOT SPOTS" ACT BUDGET FOR 1993-94

Date of Release: June 9, 1993
Date of Board Consideration: June 17, 1993
Project Coordinator: William H. Weese

RECOMMENDATION:

Authorize the Chair to send a letter to the Air Resources Board recommending additional cuts to its proposed 1993-94 State Toxic "Hot Spots" Budget. As a result of your Board's actions, other air districts have also asked the State to make reductions. To date, the State has reduced the proposed budget by $457,000 (8.12%). The efforts to make further cuts are ongoing.

SUMMARY:

On March 31, 1993, your Board Directed the staff to attend all State conducted workshops and develop a report for the Board based on the public comments and an analysis of State budget. In addition, staff was directed to develop recommendations to reduce the impact of State costs. These recommendations are provided herein for your Board's consideration and subsequent submittal to the ARB. The post workshop revised budget proposes a total ARB and OEHHA budget of $5,170,000 a $457,000 reduction from the original proposal (8.12% reduction). This post workshop reduction in the State "Hot Spots" budget resulted in lowering the proposed increase in State costs for the SJVUAPCD from 36% to 9%. The proposed State budget also accounts for a 5% contingency fee to recover costs in case of plant closures or other circumstances resulting in a proposed adjusted Budget of $5,428,500. By incorporating the following staff recommendations, the State should be able to further reduce its budget by an additional $413,350 or 8% and continue to meet the mandates of the Act.

#19

DISCUSSION:

For fiscal year 1993-94 the State Air Resources Board originally proposed a 36.35% increase in State costs for the San Joaquin Valley Unified APCD during the fee workshop process. The District adopted costs for the same period are decreased by 15.32%. The disparity between the State's proposed increase in costs and the District's projected decrease prompted the Board to direct the staff to investigate the State's proposed budget.

The final State 1993-94 budget submitted to the ARB Board for adoption on July 8, 9, 1993 is proposing to support the efforts of two different Cal-EPA departments for implementation of the requirements of the Toxic "Hot Spots" Act and the associated mandates (California Health and Safety Code §44300 et seq.). These departments are the Air Resources Board (ARB) and Office of Environmental Health Hazard Assessment (OEHHA). This proposed revised budget represents a 9% increase in State costs for the SJVUAPCD as opposed to the initial 36% increase. **Your Board's expressed concerns reiterated by the District staff during the ARB workshops helped influence the inclusion of these revisions.**

The following highlights specific components of the States program and cites unnecessary or duplicative efforts that are recommended to be cut to achieve further budget reductions.

The ARB is the lead agency in implementation of the Act and it is proposing two major changes in the Fee regulation for 1993-94. They are as follows:

1. CHANGE IN FEE CALCULATIONS METHODOLOGIES The Senate Bill 1378 (McCorquodale) required ARB to change the basis upon which Toxic "Hot Spots" (the Act) fees are calculated. The new fee schedule is designed to provide more equity in the method of fee calculation and is mandated by State law.

   RECOMMENDATIONS: **Staff recommends that your Board support this interim step.**

2. CHANGES IN THE AMOUNT OF FEES: ARB divides the requirements of the Act into four different categories of A) Inventory; B) Health Risk Assessment; C) Notification and D) Risk Reduction . This portion of the proposed budget should be cut to remove duplicative or unnecessary processes as outlined below:

A. INVENTORY/REGULATORY METHOD DEVELOPMENT AND IMPLEMENTATION: The tasks for the State portion of ARB includes regulatory development of laboratory and field test methods, test method reviews for pooled source tests, development of air toxics emissions data base, and emission data collection and validation. The ARB proposes $1,513,000 for completion of these tasks which represents 29.3% of the State costs.

The Act has been implemented for several years, new guidelines and regulations have already been drafted and the majority of regulatory overview are accomplished at the district level. Therefore, District staff are not certain what work the three person-years will be assigned to perform. This may lead to a duplication of effort.

ARB is proposing to develop Toxic emission factors based on already accomplished Toxic "Hot Spots" source testing to be used in lieu of required future testing. District staff believe that this proposal is not mandated by the Act and that much of the mandatory testing has already been performed. Therefore, the emission factor development for these purposes may be too late and relatively unnecessary.

RECOMMENDATIONS: 1) ARB could reduce the regulatory development and review budget. 2) Substantial costs could be saved by not appropriating revenues of the Act for development of emission factors.

B. HEALTH RISK ASSESSMENT: The proposed expenses in this category involve both the ARB and OEHHA. The Health Risk Assessment review requires OEHHA review of each individually mandated health risk assessment submitted. ARB review of HRA modeling data is done on a District requested case by case basis. Most HRAs required by the Act have already been submitted.

RECOMMENDATIONS: District staff recommend this category cost to be substantially reduced for both ARB and OEHHA.

RECOMMENDATIONS: OEHHA to spend some of the revenues from fees on training various district personnel to conduct OEHHA style HRA reviews such that the majority of HRA related work could be done at the district level. This would eliminate duplication of work between the districts and the State, adds considerable efficiency to the process and has the potential to save substantial time and money for all future HRA reviews for the State, districts and ultimately the industry. Under this caveat, only complex HRAs would require OEHHA reviews and would be forwarded to OEHHA on a case by case basis.

C. PUBLIC NOTIFICATION: The public notification aspect of the Act requires the State agencies to assist with notification procedures development, participate in notification hearings and assist with health risk interpretation.

The CAPCOA Risk Notification Document has already been developed and is being used for development of district specific risk notification procedures documents such as the one your Board approved in May's hearing. The remaining ARB work is a maintenance work which does not entail "re-creating" the documents.

RECOMMENDATIONS: ARB should be able to reduce this line item with a substantial cost savings.

#10

In addition, approximately 10% of the HRAs may lead to designation of significant risk facilities. This would be roughly 80 notification hearings which require OEHHA participation. Assuming preparation and travel time for each hearing would require 10 hours for the OEHHA staff the following would be a reasonable cost estimate:

80 Hearings X 10 hours per hearing = 800 hours

Typical person hours/year 40 hrs/wk X 50 wks/yr = 2,000 hrs/yr

Personnel time needed for notification = 800/2000 = 0.40

RECOMMENDATIONS: **The proposed OEHHA Budget should reflect 0.40 person years for public notification meeting participation.**

D. RISK REDUCTION: Risk reduction is required pursuant to mandates of Health and Safety Codes §44390. Originally, during workshop presentations, both ARB and OEHHA were proposing to spend $1,319,000 for HRA portion of these requirements. However, these monies were adjusted down by $457,000 because it was determined, after the public workshops, a significant amount of risk reduction related workload will be delayed beyond 1993-94 into 1994-95.

The risk reduction audits and plans requirements become effective after the affected facilities are required by the district to notify the public of the potential health risk associated with each facility. Since the HRA process is yet to be completed, even at the most optimistic schedule, a facility may not be covered by the risk reduction requirements until early 1994 from which the facility has six months to submit the audit plan. Therefore, it is more likely that risk reduction workload and costs would only have a significant role late in the next fiscal year. Further, the risk reduction audit and plan requirements do not mandate that OEHHA review or approve the submitted HRAs. According to the proposed budget the ARB and OEHHA are proposing to spend $517,000 for implementation of the risk reduction and planning requirements. Please note that different ARB and OEHHA cost savings are suggested because small facility risk reduction audit and plan guidelines required to be developed by ARB may not be needed until 1994-95.

RECOMMENDATIONS: **OEHHA should be able to substantially reduce the risk reduction audits and plans expenses, and the ARB should be able to introduce further cuts in these expenses.**

WORKSHOPS AND PUBLIC COMMENTS

The State personnel held three different workshops in Sacramento, Fresno and San Bernardino. In accordance with your Board's directions, the staff attended all three workshops and expressed the Valley's concerns regarding the proposed fee increases.

Generally, the workshops were poorly attended, with an average of 15 persons attending each workshop (Only 6 people attended the Fresno workshop). The majority of attendees did not raise the issue of increased state costs until after the District staff brought up the issue. Subsequently, the public questioned the appropriateness of the increased state costs.

FINAL COMMENT PERIOD AND ARB BOARD HEARING The final comment period for the proposed State budget is in writing prior to ARB Board hearing. In addition verbal testimony maybe presented during the appropriate time at the ARB Board hearing scheduled for July 8, 9, 1993. A specific final date and time for the hearing will be published at least 10 days prior to July 8, 1993.

#1c

Table 1

Current Year Budget and Proposed Budget

Fiscal Year (FY) 1992-93	ARB	OEHHA	Total
Proposed	2,172,000	1,780,000	3,952,000
10% Budget Reduction	-395,000	0	-395,000
Statewide Technical Budget Adjustment*	-85,000	0	-85,000
Final FY 1992-93	1,692,000	1,780,000	3,472,000
FY 1993-94 Governor's Budget			
Restoration of 10% Reduction	395,000	0	395,000
Database Savings	-221,000	0	-221,000
Statewide Technical Budget Adjustments*	61,000		61,000
SB 1731 Requirements			
Limited-term positions**	74,000	272,000	346,000
One-time equipment and contracts***	28,000	175,000	203,000
Remaining costs	367,000	1,004,000	1,372,000
Subtotal for SB 1731	469,000	1,451,000	1,920,000
Initial Proposed FY 93/94	2,396,000	3,231,000	5,627,000
Reduced Proposal			
Reduced Calderon Activity			
Limited-term positions		-272,000	-272,000
Other costs		-185,000	-185,000
Subtotal	0	-457,000	-457,000
Reduced Proposed FY 93/94	2,396,000	2,774,000	5,170,000

* Reflects employee salary adjustments.

** ARB: 1.0 position one-year limited term
OEHHA: 5.0 positions subject to reevaluation in fiscal year 1995-96.

*** ARB: One-time equipment costs
OEHHA: One-time equipment ($125,000) and contract ($50,000) costs.

GAS

INDUSTRIAL ENVIRONMENTAL ASSOCIATION

Leaders of Environmental Responsibility

June 21, 1993

The Honorable Jananne Sharpless, Chairwoman, and Members of the Air Resources Board
California Environmental Protection Agency
P.O. Box 2815
Sacramento, California 95814

Re: Comments on the Proposed, FY 93-94, AB 2588 Fee Regulation and Its Impact On California Businesses.

Dear Chairwoman Sharpless and Members of the Board:

On behalf of the San Diego Industrial Environmental Association (IEA) and others concerned about the FY 93-94 AB 2588 fee regulation, we are providing the following comments for your consideration. We do not recommend that the Air Resources Board (ARB) adopt this regulation as it is currently written. Nevertheless, we do appreciate California Environmental Protection Agency's (Cal EPA) concern about the current California business climate and stand ready to offer suggestions for improving the regulatory component of this issue. Further, we would like to express our thanks to the ARB staff, specifically, Mr. Don Ames, Ms. Janette Brooks and Ms. Carla Takamoto of the stationary source toxics division, for their willingness to address our concerns about AB 2588 fees. Most importantly, they agreed to carry our message back to Sacramento. The following is a summary of four (4) salient points that would improve upon the proposed fee regulation.

Health Risk Assessment (HRA) Review Cost Recovered on a "Fee for Service" Basis

The ARB and Office of Environmental Health Hazard Assessment (OEHHA) HRA review cost should be removed as a component of the budget proposal and instead recovered on "Fee for Service"/Unit Specific basis. Current law actually allows for this method of fee recovery and it should be encouraged in other areas where specific cost are incurred for services performed on behalf of a particular source. Some Districts have already implemented similar programs and have recognized benefits in the areas of labor tracking, permit streamlining and public acceptance of this business friendly accounting principle. Fee for Service encourages both the agency and the source to be more productive in order to reduce cost and be more efficient with their limited resources. Additionally, a base fee that addresses the sources level of toxic emissions can be added to the "Fee for Service" charge, thereby ensuring compliance with SB 1378 (McCorquodale, 1992).

Freeze All Non HRA Review Related Fees at FY 92-93 Levels

We strongly recommend that all non-HRA review related fees be frozen at FY 92-93 levels. As you might imagine, this practice is currently being followed by businesses and local governments throughout California in order for them to remain financially solvent. It is expected that when certain streamlining requirements are implemented a substantial savings will be achieved. Those savings can be used to offset program workload increases resulting from SB 1731 (Calderon, 1992). In discussions with Mr. Calderon's staff, it was stated that Senator Calderon had originally expected SB 1731 cost to be absorbed by current levels of AB 2588 funding without increasing program cost for affected sources. The $ 937,000.00 implementation cost was added to the bill after the legislative analysis was performed.

7777 Alvarado Road • Suite 708 • La Mesa, CA 91941-3656 • (619) 460-4212 • FAX (619) 460-0080

Develop SB 1731 HRA Guidelines that Both the Air Districts and Affected Sources Can Use

OEHHA must ensure that the guidelines they develop are user friendly, incorporate the work already accomplished in the AB 2588 program and result in a tool that can be used to reduce program cost to businesses while protecting public health. We feel that there is currently a substantial amount of good HRA data available that OEHHA can use for guidelines development. This should help reduce cost and development time associated with this effort. It is extremely important that the air districts and affected sources play an integral part in this process. By involving those mentioned, it is most likely that the end product will meet everyone's needs.

Charge Appropriate Fees for Compliance Assistance Services

The ARB needs to charge an appropriate fee commensurate with the degree of compliance assistance offered to various sources. This will ensure that sources not requiring assistance will not be subsidizing those that do. If an adequate labor tracking system is in place, then work specific to each facility can be easily accounted for. This will encourage affected sources to become more familiar with all AB 2588 requirements instead of being overly dependant on state assistance. We truly believe that this is how sources can better understand the toxic emissions from their processes, and therefore, be more capable of achieving reductions of those emissions wherever possible.

In conclusion, business supports programs like AB 2588 and have a vested interest in their integrity and usefulness. In addition, we understand that increases in workload need to be funded but given the current state of California's economy and its member businesses, we're asking that the state do more with less. Again, this has become commonplace in the business community. At a minimum, we recommend that AB 2588 program base fees be frozen FY 92-93 levels, all HRA reviews be charged back to the affected sources on a "Fee for Service basis, SB 1731 workload increases be offset by agency streamlining savings and that the HRA guidelines are developed to be user friendly with input from the air districts and affected sources. Improvements in ARB and OEHHA labor tracking systems can be accomplished during the next FY period and we would gladly participate in such an effort if asked to do so. Thank you for your consideration of these comments. If you have any questions and/or concerns, please give me a call at (619) 460-4212.

Sincerely,

Paul Downey
Executive Director

cc: Members of the California Air Resources Board
Mayor Susan Golding, City of San Diego
Chairman Brian Bilbray, San Diego County Board of Supervisors
Mr. Jim Boyd, ARB Executive Officer
Mr. Rich Sommerville, San Diego APCO

INDUSTRIAL ENVIRONMENTAL ASSOCIATION

Leaders of Environmental Responsibility

MISSION STATEMENT: Promote responsible, cost effective environmental laws and regulations, facilitate environmental compliance among member companies, and provide related educational activities for the community.

HISTORY

The IEA was formed in May, 1983 as an ad-hoc group working to provide technical input on environmental legislation and local regulations. After its successful collaboration with county staff and the Board of Supervisors in redrafting major portions of a proposed Hazardous Materials Disclosure Ordinance, the participants agreed that the informal organization should be formalized as a non-profit corporation. This was accomplished on September 12, 1983. The group has since met regularly to study environmental issues which affect business interests in the community as well as exchange information necessary for regulatory compliance and understanding of these complex matters.

MEMBERS

Alcoa Electronic Packaging, Inc.
Carpenter Technology Corporation
Caspian, Inc.
Chem-Tronics, Inc.
Chevron USA
CH2M Hill
Continental Maritime of San Diego, Inc.
General Atomics
General Dynamics - Space Systems Division
Hawthorne Machinery Company
Hewlett-Packard
Hughes Aircraft Company
Johnson Matthey
Kelco, Division of Merck & Company, Inc.
La Posta Recycling Center, Inc.
Law-Crandall, Inc.
Maxwell Laboratories
Napp Systems
National Steel & Shipbuilding Company
Pacific Treatment Environmental Services, Inc.
Precision Metal Products, Inc.
Remec, Inc.
Rohr Inc.
San Diego Gas & Electric Company
Shenas, Shaw & Spievak, A.P.C.
Signet Armorlite, Inc.
Solar Turbines, Inc.
Sony Display Tube Company
Southwest Marine, Inc.
Sundstrand Power Systems
Teledyne Ryan Aeronautical
Union-Tribune Publishing Company
Unisys
Woodward-Clyde Consultants

ACTIVITIES

The IEA's members meet monthly to exchange information, discuss technical, legislative and regulatory issues, and to formulate positions with respect to matters of community interest. The organization sponsors an annual conference on environmental compliance and co-sponsors workshops on environmental compliance issues with CAL-EPA, the County Department of Health Services and the Air Pollution Control District. The IEA also has an interest in promoting public awareness of environmental issues, and has worked with the County Department of Education and with university and public schools' secondary science curriculum offices.

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Attachment 1

FACILITY COUNT FOR FISCAL YEAR 1993-94 FEE REGULATION

District: San Joaquin Valley

Total number of facilities designated by the district by April 1, 1993, as being in the respective program categories, except for Risk Assessment-State categories. Risk Assessment-State numbers are those risk assessments submitted to OEHHA from April 1, 1992 through March 31, 1993. Numbers do not include facilities completing a one-time survey or included in an industrywide inventory.

Program Category	ARB Count	District Count	Small Business
Plan and Report, SCC 1 & 2	460	196	
Plan and Report, SCC 3 - 5	258	183	
Plan and Report, SCC >5	481	429	
Risk Assessment-District, SCC 1&2	6	11	
Risk Assessment-State, SCC 1 & 2		~~0~~ 1	
Risk Assessment-District, SCC 3-5	17	14	
Risk Assessment-State, SCC 3-5	1	1	
Risk Assessment-District, SCC >5	27	~~40~~ 42	
Risk Assessment-State, SCC >5	17	~~19~~ 16	
Notification			
Audit and Plan			

Verified by:

Name: Bill Weese by RJKorenberg

Phone: (209) 497-1000

updated 6/22/93 Telcon RJ Korenberg w/ Bill Weese

Mail to: Roger Korenberg
Air Resources Board/SSD
P.O. Box 2815
Sacramento, CA 95812

FAX number: (916) 327-5621

RECEIVED 6-28-93

LAKE COUNTY AIR QUALITY
Management District

883 Lakeport Blvd Phone: (707) 263-7000
Lakeport, California 95453 Fax: (707) 263-1052

Robert L. Reynolds
Air Pollution Control Officer
Noise Control Officer

→ Don

93-8-2
7/8/93

XC: Bd mbr
JS MHS
JO SSD
JB Legal

June 24, 1993

Board Secretary
Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Re: "Amendments to the Air Toxics Hot Spot Fee Regulation" - Support for the staff proposed changes as noticed - Hearing July 8, 1993.

Dear Chairperson Sharpless and Board Members:

The Lake County Air Quality Management District has followed and participated in the development of the subject proposal. We are acutely aware of the real and legal need for the changes proposed by the staff. We wish to make it clear that we strongly support the adoption of proposed amendments.

During several workshops and many information exchanges your staff has worked with regulatory agencies and affected industry to change the existing approach and to add equability. Many affected industries have believed the per ton charge basis, and the ignoring of the complexity and toxicity of sources has been an unfair approach. Your staff and CAPCOA have weighed the numerous perspectives that exist, and incorporated significant amendments in a manner that best handles the many Agency and Industry perspectives and priorities. Finally, the amendments clearly conform in the best possible manner to new legislative requirements.

We strongly support the consideration for small businesses as well as the state fee exemption for industrywide surveys performed by District's. The incorporation of markedly more equability in fee charges, based upon the complexity and potential health risks resulting from affected sources, is also an essential and long overdue change in approach.

Once again, we strongly recommend that you adopt the proposed amendments promptly so that Districts can initiate these changes locally in a timely manner.

Sincerely,

Robert L. Reynolds

Robert L. Reynolds

CC: Interested Parties

JUL - 6 1993

PRO-LINE PAINT CO.
paint manufacturers • coating engineers

(619) 231-2313
Telex No.: 695085 Pro Line SDG
FAX No.: (619) 236-9681
2646 MAIN STREET
SAN DIEGO, CALIFORNIA 92113-3697

June 25, 1993

93-3-2
7/9/93

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 7/6/93

Mr. James D. Boyd
Executive Officer
California Air Resources Board
2020 L Street
Sacramento, California

XC. JD MHS
JS SSD
JB

Ref: Titles 17 and 26 - California Air Resources Board Notice of Public Hearing on July 8, 1993 to Consider Amendments to the Air Toxics Hot Spots Fee Regulation

Dear Mr. Boyd:

We disagree with the proposed Air Toxics "Hot Spots" fee increases for the following reasons:

AB2588 requires a Toxic Air Contaminants Emission Inventory Plan. We complied by writing the required PLAN. After approval of this plan, a yearly Toxic Air Contaminants Emissions Inventory Report was required. The purpose of this report was to monitor toxic emissions. We complied and submitted this report.

The handling and monitoring of AB2588 "Emission Inventory Report of Toxic Chemicals" by the San Diego Air Pollution Control District, has already increased approximately 588% during the past two years. (The fee imposed in 1991 for the Toxic Air Contaminants Emission Inventory Plan was $340.00 and the Toxic Air Contaminants Emission Inventory Report was raised to $2,000.00 in 1992 -- $2,000 / $340 X 100% = 588%).

Businesses that fall under AB2588 regulations should now be given the opportunity to voluntary decrease the use of extremely hazardous chemicals on the list of AB2588, i.e., reduction or elimination of a chemical or chemicals known to cause cancer, birth defects or other reproduction harm. This may eliminate the need to write "Health Risk Assessment Reports", thereby eliminating high government, Statewide, regulatory monitoring fees imposed on the small businesses for the administration of AB2588.

We urge you to work with the industry and monitor the "Toxic Air Contaminants Emissions Inventory Reports" for the next five to seven years without any increase in fees. Thereafter, a scientific determination should be made if it is necessary to continue additional regulations and/or fees to further implement AB2588.

June 25, 1993
Letter to: Mr. James D. Boyd, California Air Resources Board

We do not want the same thing to happen with AB2588 that has happened with our permits to operate machinery for the manufacture of paints. For example, permits to operate machinery for the manufacture of paint has increased over the last six years - approximately 2,700 percent.

Please note how this 2,700 percent has occurred:

1985 - 5 machinery permits @ $32.00 each = $160.00.
1986 - 5 machinery permits @ $70.00 each = $350.00.
1987 - 5 machinery permits @ $145.00 each = $725.00.
1988 - 5 machinery permits @ $463.00 each = $2,315.00.
1989 - 5 machinery permits @ $470.00 each = $2,350.00.
1990 - 5 machinery permits @ $867.00 each = $4,335.00.
1991 - 5 machinery permits @ $922.00 each = $4,610.00.

Please be advised that small businesses cannot survive under the present high regulatory fees and be competitive with large companies in the United States and abroad.

Pro-Line strongly recommends that the ARB budget for AB2588 be frozen at FY92-93 levels and that any additionally mandated requirements be funded through savings produced from ARB streamlining efforts.

Sincerely,

E. Soeterik
Vice President Operations/
Chief Chemist

IEA3

SPRECKELS SUGAR COMPANY, INC.
40600 COUNTY ROAD 18C • P.O. BOX 2240 • WOODLAND, CA 95695 • (916) 662-3261 • (916) 668-1360

June 25, 1993

Genevieve Shiroma
Chief
Toxic Air Contaminant Identification Branch
Stationary Source Division
P.O. Box 2815
Sacramento, CA 95812

RE: Proposed Fee Changes

The following are my comments on the Air Toxic "Hot Spot" Fee Regulation:

> Our company does not support collection of extra "Hot Spots" fees from low risk facilities to implement SB1731. It is not good policy to have all facilities in the "Hot Spots" program Pay for Additional CARB program personnel and additional outside consultants to develop new facility risk assessment guidelines that will mainly benefit only 500 higher risk facilities statewide. Low risk plan-and-report complex facilities like ours are now expected to pay an extra $947 for the state portion of "Hot Spot" fees. Instead, these 500 higher risk facilities should bear the brunt of the proposed $457,000 funding increase to implement SB1731.

Thank you for the opportunity to comment.

Larry Bailey

Larry Bailey
Manager of Safety and Environment

cr
BAILEY\Shiroma.Tox

HOMESTAKE MINING COMPANY

McLaughlin Mine

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 6-29-93

→ DM

XC: Bd Mbrs
JS mHS
JD SSD
JB Legal

93-8-2
7/8/93

June 25, 1993

Board Secretary
Air Resources Board
P. O. Box 2815
Sacramento, CA 95812

RE: Staff Proposed Changes (7/8/93) to the Air Toxics Hot Spot Fee Regulation

Dear Chairperson Sharpless and Board Members:

I wish to communicate my support for the staff proposed changes to the Air Toxics Hot Spot Fee Regulation noticed July 8, 1993. These changes demonstrate a fair and equitable approach to fee regulation. Emphases placed on source complexity, actual health risks, and support for small business show the ARB is once again focused on real issues and practical application of regulation.

I ask that you adopt the proposed amendments and continue to support the efforts of our local air districts.

Sincerely,

James P. Jackson
Sr. Environmental Engineer

JPJ:gm

xc: R. Reynolds, LCAQMD
R. Krauss

Homestake Mining Co., McLaughlin Mine
26775 Morgan Valley Road
Lower Lake, CA 95457

Telephone (707) 995-6070
FAX (707) 995-6078

BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

June 24, 1993

(9)

Peter Venturini
Chief, Stationary Source Division
Air Resources Board
P.O. Box 2815
Sacramento CA 95812

Dear Mr. Venturini;

Thank you for allowing us to comment on your proposed revisions to the AB2588 Fee Regulation. We appreciate the fine efforts of your staff to develop a regulation that is equitable to both the affected facilities and the Districts that are implementing the AB2588 program.

The methodology of resource indices and numbers of affected facilities in each specific AB2588 program categories was reviewed by the AB2588 CAPCOA Fee Committee and chosen as the best alternative to using toxic emissions based fees (which are not feasible at this time on a statewide basis). However, the BAAQMD has been able to develop a toxic emission inventory since 1987 and has charged AB2588 fees based on toxic emissions since 1990. We strongly encourage the Air Resources Board to proceed toward this type of fee allocation for the 1994/1995 AB2588 Fee Regulation.

We appreciate the reduction of our District's share of state cost. This is because the BAAQMD's AB2588 program has progressed rapidly and most of the emissions review and risk assessment work has already been completed.

The BAAQMD supports the plan of the Special Projects Section to develop guidelines for implementation of SB1731. We support steamlining the risk reduction planning requirements for small businesses by developing simple checklists for facilities such as dry cleaners, gasoline service stations, and paint shops. This will allow the Districts to implement SB1731 more efficiently and will help minimize the cost to the program.

If you have any questions, please call Scott Lutz at (415) 749-4676 or Sandra Lopez at (415) 749-4711.

Very truly yours,

Milton Feldstein
Air Pollution Control Officer

939 ELLIS STREET • SAN FRANCISCO, CALIFORNIA 94109 • (415) 771-6000 • FAX (415) 928-8560

STATE OF CALIFORNIA
AIR RESOURCES BOARD
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unocal 76

JIM JONAS, INC. DISTRIBUTOR · Union Oil Co. of California

16445 Main Street
Post Office Box 277
Lower Lake, California 95457
Telephone (707) 994-6535
FAX (707) 995-3125

93-8-2
7/8/93

XC: Bd Mbr
JS mHS
JD SSD
JB Legal

(13)

June 28, 1993

Air Resources Board
P.O. Box 2815
Sacramento, Ca. 95812
Board Secretary

Re: "Amendments to the Air Toxics Act Spot Fee Regulation" - proposed changes.

It appears that the proposed regulation changes being considered at your July 8, 1993 hearing will result in a more equitable fee application and as a business owner who is badly in need of regulatory relief, I support these changes.

Jim Jonas

c.c.
Lake County Air Quality
Management District
883 Lakeport Blvd.
Lakeport, Ca. 95453
Attn: Bob Reynolds

Santa Barbara County
Air Pollution Control District

June 29, 1993

Janette Brooks
Manager, Special Project Section
Stationary Source Division
California Air Resources Board
2020 L Street
Post Office Box 2815
Sacramento, CA 95812

Re: Support Information for Air Toxics "Hot Spots" Fee Regulation

Dear Ms. Brooks:

As we discussed earlier this week, this letter confirms updates to Santa Barbara County Air Pollution Control District (District) information for the Air Toxics "Hot Spots" Fee Regulation for 1993/94. In mid-June correspondence between Richard Stedman of the District and Roger Korenberg of ARB, revised facility counts were submitted and confirmed. These revisions shifted facilities with an intermediate prioritization ranking from the risk assessment category to the plan/report category. In addition, our program costs for the 93/94 fiscal year have been reduced to $225,000. This is a decrease from the $297,200 budget submitted to the state in March, 1993.

The redistribution of facilities from the risk assessment to the plan/report category is based on risk assessment results. To date, risk assessment results for facilities with an intermediate priority ranking indicate that these facilities do not pose a significant health risk. Since the District performed these risk assessments, it was decided that the facilities should not bear the cost burden associated with the more resource intensive category.

The reduction in program costs is prompted by recent approval of revisions to the Criteria and Guidelines Regulation (CGR). The CGR revisions introduce a <u>one year deferral</u> for submittal of update plans for Phase I and Phase III facilities. These biennial update plans were originally due in August of 1993. While a considerable work effort is still required for the 93/94 fiscal year, the District will realize a limited decrease in the staff effort required to oversee the "Hot Spots" program during this one year interlude. <u>Please note that the District envisions this reduction as a one year phenomenon</u>, with program costs in the subsequent fiscal year expected to return to a level comparable to that <u>originally</u> proposed for the 93/94 fiscal year.

We understand that these changes will be reflected in a revised Fee Regulation available for public review subsequent to the public hearing on July 8 and 9. If you have any questions, please call me at (805)961-8921.

Sincerely,

James McCarthy
Supervising Engineer, Air Toxics Section

cc: John Nicholas, APCD
Doug Allard, APCD
Richard Stedman, APCD
PLN Chron File

26 Castilian Drive B-23, Goleta, CA 93117 Fax: 805-961-8801 Phone: 805-961-8800
James M. Ryerson, Air Pollution Control Officer William A. Master, Assistant Director

AGGRELITE ROCK
VOLCANIC CINDER PRODUCTS

93-8-2
7/8/93

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 7/2/93

XC: Bd Members
JS MHS
JD SSD
JB Legal

June 30, 1993

Board Secretary
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: "Amendments to the Air Toxics Hot Spot Fee Regulation"...Support for staff proposed changes as noticed in Hearing July 8, 1993.

Dear Chairperson Sharpless and Board Members:

As a quarry operator, we support the fee approach being recommended by the staff. It is the only equitable way of spreading the costs to those of us who are being monitored.

Sincerely,

RICHARD BAILEY
General Manager

PO Box 800
Clearlake Oaks, CA 95423
(707) 998-3346 1-800-LAVA RED

County of Tuolumne

Air Pollution Control District

Gerald A. Benincasa
Air Pollution Control Officer

22365 So. Airport Rd
Columbia, CA
MAILING
2 So. Green St.
Sonora, CA 95370
Phone: (209) 533-5693

July 2, 1993

93-8-2
7/8/93

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 7/6/93

— xc: Eric Mambeka
JS MHS
JD SSD ✓
JB Kaye

Jananne Sharpless, Chairwoman
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Madam Chairwoman:

Thank you for this opportunity to comment on the Proposed Amendments to the Air Toxics "Hot Spots" Fee Regulation for Fiscal Year 1993-94. I would like to specifically address the proposed fee calculation method.

As you know, Toxic Hot Spots fees have been calculated on a criteria pollutant basis with the understanding that fee assessments would eventually move toward an air toxics emission basis. However, high quality air toxics emissions data currently do not exist for much of the state; therefore, it would be premature to complete the shift to an air toxics basis. The proposed fee calculation method--based on facility program categories--is a reasonable interim method and an improvement over the criteria pollutant emissions method.

When paying fees, the regulated community requests two things: service and accountability. By basing the fees on program categories--and the workloads of the Air Resources Board (ARB), the Office of Environmental Health Hazard Assessment (OEHHA) and the air districts in each category--the facilities can be more assured of "getting what they pay for." The higher fees are commensurate with a higher level of service, such as reviewing health risk assessments.

Regarding accountability for state fees, the burden of proof lies with the ARB staff and the OEHHA staff; however, let me say that the ARB staff has been very receptive to district input during the entire fee development process. As with any change in fee assessment technique, some will pay more and some will pay less; I believe that the proposed methodology of fee assessment is an improvement and should be adopted by the Board.

Please call me if you have questions or comments.

Sincerely,

Mike Waugh

MIKE WAUGH
Deputy Air Pollution Control Officer

MW:rh

7/8/93

XC: Bd members MHS JJ SSD JD Legal JB

County of Glenn AIR POLLUTION CONTROL DISTRICT

ED ROMANO, Air Pollution Control Officer,
Director: Underground Storage Tanks

July 6, 1993

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 1
To Pat Hutchens	From Cindy
Co.	Co. Glenn
Dept.	Phone # 916 934-6500
Fax # 323-0764	Fax # 916-934-6503

CARB Secretary
PO Box 2815
Sacramento, CA 95812

Dear Board Members

Re: Hot Spots Fee Regulations

The Glenn County Air Pollution Control District has a problem in supporting a seventy three per cent (73%) increase in Hot Spots fee for the CARB Hot Spots program, when the Districts Hot Spots program fee is being reduced.

I would request that the Board consider a smaller increase in consideration of the present economical situation. All of us are having to make do with less resources.

Sincerely

Ed Romano

Ed Romano
Air Pollution Control Officer

720 N. Colusa St. - P. O. Box 351 - Willows, California 95988 - Phone (916) 934-6501 or 865-4280 - FAX (916) 934-6503

AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

July 6, 1993

Mr. James Boyd
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

PROPOSED 93/94 STATE BUDGET AND FEE REGULATION FOR THE AB2588 AIR TOXICS "HOT SPOTS" PROGRAM

The District cannot support the state budget as proposed in the FY 93/94 AB2588 Fee Regulation. Under the proposed state AB2588 budget, the state portion of fees for San Diego will increase from $140,276 in FY 92/93 to $304,883. In accordance with an Air Pollution Control Board directed moratorium on additional County regulatory fees, the District absorbed a State fee increase of $11,000 from FY 91/92 to FY 92/93. The District would not be able to absorb the proposed increase of $164,607 for FY 93/94. Local affected facilities have also expressed serious concerns regarding any increase in fees during these difficult economic times. Some specific comments and suggestions are attached.

The District would like to thank your staff for their efforts in developing the fee regulation. Janette Brooks and Don Ames were particularly helpful during a meeting with District staff and local facility representatives. Please contact Craig Anderson at (619) 694-3318 if you have additional questions.

R. J. SOMMERVILLE
Air Pollution Control Officer

RJS:CA:nt

Enclosure

9150 Chesapeake Drive • San Diego • California 92123-1096 • (619) 694-3307
FAX (619) 694-2730 • Smoking Vehicle Hotline 1-800-28-SMOKE

SDAPCD COMMENTS
PROPOSED 93/94 STATE BUDGET AND FEE REGULATION
FOR THE AB2588 AIR TOXICS "HOT SPOTS" PROGRAM

Changes in Fee Regulation Methodology

Previous AB2588 fee regulations have assessed state costs to facilities and districts according to estimated emissions of criteria pollutants rather than emissions of toxic air contaminants. Health and Safety Code Section 44380 was amended in late 1992 by SB1378 to require an AB2588 fee regulation based, to the maximum extent practicable, on the significance of each facility's toxic emissions.

The ARB proposed 93/94 fee regulation methodology is intended to be based on estimated cost recovery for each program requirement.

The proposed methodology can be further refined. Specific areas of concern are:

- Labor tracking procedures should be implemented at ARB or OEHHA that could provide an accurate accounting of past and future state expenditures of AB2588 funds. Air districts and industry would, therefore, be able to verify the appropriateness of state fees allocated to program tasks as identified in Figure 4 (page 47 & 48) of the Fee Regulation.

- The suggested method of apportioning state costs among districts is only acceptable for administrative and program development tasks common to all districts and facilities. As proposed, all districts would share state costs equally despite wide disparities in the level of assistance provided to individual districts. Significant state costs associated with specific facilities and air districts should be recovered from those facilities or districts. Facilities in one district should not pay for inordinate ARB or OEHHA activities in other districts.

- The proposed method to recover OEHHA Health Risk Assessment costs conflicts with Health & Safety Code 44361(c) which requires OEHHA to bill separately for each risk assessment review. As proposed, the OEHHA costs will be spread out over all facilities performing risk assessments regardless of the actual labor expended. Facilities that expended extra resources in performing a comprehensive risk assessment will pay the same fee as a similar facility performing a minimal and inadequate study.

Proposed Increases in State Fees

Total State funding for AB2588 tasks has been nearly $10,000,000 from FY88/89 to FY91/92. An additional $3,470,000 was spent in FY92/93. The proposed FY93/94 budget is $5,170,000 of which $2,396,000 would be allotted to ARB and $2,774,000 to OEHHA. This represents an increase from FY 92/93 expenditures of 42 and 56 percent, respectively. While a shift in funding is expected for emerging programs like AB2588, this increase is dramatic and does not appear to reflect changes in program priorities. Issues of concern include:

- State program costs continue to escalate even though most of the program development is completed. Further, nearly all tasks associated with actual program implementation are performed by local facilities and districts. Planned significant changes in program guidance regulations will streamline efforts at every level, particularly the state, and should reduce further state costs.

- The proposed ARB and OEHHA budgets lack sufficient detail to identify specific objectives. It is impossible for air districts and industry to verify that resources budgeted by the state are actually effective at the local level.

- The proposed state budget is not sufficiently responsive to current local needs or economic realities. The proposed budget includes continued substantial funding for data acquisition, data management and regulation development tasks, all of which have little local value. ARB and OEHHA efforts must be redirected to provide districts and facilities with the tools necessary to streamline implementation procedures and minimize overall program costs.

- Proposed SB1731 program development funding for FY93/94 ($1,463,000) appears to be excessive, given the small number of facilities immediately subject to the requirements and the substantial responsibilities that will be borne by local districts.

SAN DIEGO AIR POLLUTION CONTROL DISTRICT
9150 CHESAPEAKE DRIVE
SAN DIEGO, CA 92123-1095
PHONE (619) 694-3307
FAX (619) 694-2730

TO: GENEVIEVE SHIROMA
ARB-SSD

FAX #: 916 327-5621

TOTAL PAGES (*including this cover sheet*): # 4

Please Check One:

_____ Please let us know by phone at (619) 694-______ that this FAX has been receive
(*This may be necessary to assure compatibility of our units.*)

_____ It is not necessary to contact us regarding receipt of this FAX message.

• •

SENDER'S INFORMATION

FROM: CRAIG ANDERSON
SD-APCD

TIME/DATE: 7/7 @ 1:50

COMMENTS: LETTER - AS WE DISCUSSED. UNFORTUNATELY, METHODOLOGY IS NOT SUPPORTED TO THE EXTENT I HAD INTENDED.

Santa Barbara County
Air Pollution Control District

FAX TRANSMITTAL

MEMORANDUM

TO: Janette Brooks, ARB

FROM: Richard Stedman, Air Toxics Section

DATE: July 7, 1993

SUBJECT: AB 2588 Small Business Fee Cap

For your consideration, attached to this memo is a copy of a letter received by the District from Mr. Bruce Falkenhagen regarding facilities in Santa Barbara County that may qualify for the small business fee cap under the proposed Fee Regulation for FY 1993/94.

Mr. Falkenhagen, in an earlier letter to the District, listed a number of facilities that he consults for as possible candidates for the small business fee cap. The District contacted these facilities and requested "sufficient documentation" for the small business qualification prior to the July 8, 1993 Air Resources Board Fee Regulation hearing date. The only response to date we have received back from the facilities is in the form of the attached letter from Mr. Falkenhagen.

If you have any questions concerning this transmittal, please do not hesitate to call me at (805) 961-8916.

26 Castilian Drive B-23, Goleta, CA 93117 Fax: 805-961-8801 Phone: 805-961-8800
James M. Ryerson, Air Pollution Control Officer William A. Master, Assistant Director

Our Vision: Clean Air

Energy Enterprises
Specializing in Alternate Energy Development

July 7, 1993
Via FAX and hardcopy

Richard Stedman
SBAPCD
26 Castilian Drive; B-23
Goleta, CA 93117

Re: Response to letter of 6/28/93
AB 2588 "Small Business" Fee Cap

Dear Richard:

On June 25, I sent Doug Allard a letter listing the following 6 companies as possible candidates for the small business fee cap:

- Conway Oil- Enos
- Conway Oil- Union Sugar
- Petrominerals- Magenheimer
- Geo Petroleum- Careaga
- Richards- Peshine/Tompkins
- KC Resources- Casmalia

This letter was sent to your office to show who may qualify, depending on the ultimate outcome of the Fee Regulation hearing on July 8 in Sacramento.

On June 28, you sent a letter to each of those companies asking for "sufficient documentation demonstrating satisfaction of the criteria" of 10 employees and $500,000 gross receipts.

As you are aware, the ARB has not provided guidance on what is "sufficient documentation" (is it copies of IRS tax returns, or a simple certified statement?) and there is also a question of the appropriate definition of a small business. The purpose of the letter was to inform you that these six operations may qualify, since you needed to know that for budgeting purposes. On July 8 the Board may increase the level to $1,000,000 or decrease it to $250,000. Until yesterday, it was not even decided by staff if the dollar limit and number of employees applied to all company operations, or just the facility in question. As such, it is impossible to meet your request of providing proof by July 7. Once the ARB makes its decision on these points in the definition, we will provide the APCD with the appropriate ARB approved notification.

In addition, could you check your records with regards to the cc: list. I only received a copy of the letter you sent to KC Resources, and not for the other 5

leases. I should be on the cc: list for all companies. If you have any questions, please give me a call.

Sincerely,

E. Bruce Falkenhagen

cc: Bruce Conway
Philip Farahmand
Gerry Raydon
Dick Carroll
Eric Woodside/Rehner Klawiter
Doug Allard

Santa Barbara County Air Pollution Control District

Our Vision: Clean Air

26 Castilian Drive, B-23, Goleta, CA 93117 Phone: 805-961-8800 FAX:805-961-8801
James M. Ryerson, Air Pollution Control Officer *William A. Master, Asst. Director*

FAX NO: (916) 327-5621

PLEASE DELIVER THE FOLLOWING PAGES TO:

DATE: 7/7/93 TIME: 4:00

NAME: Janette Brooks

FROM: Richard Stedman

COMPANY: ARB, Mgr, Spec Projects

DIV: Planning

NUMBER OF PAGES INCLUDING THIS PAGE: 4

PLEASE CALL TO CONFIRM TRANSMITTAL (Y/N)_____

ORIGINAL WILL NOT FOLLOW_____

ORIGINAL WILL FOLLOW BY: U.S.MAIL___ FED-EX___ INTEROFFICE___ OTHER_____

COMMENTS:_____

93-S-2
7/8/93

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED ON DATE 7/7/93

XC. Bd Members
MHS
JS
SSD
JD
JB

South Coast
AIR QUALITY MANAGEMENT DISTRICT
21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2000

July 7, 1993

Jananne Sharpless, Chairwoman
Air Resources Board
P.O. Box 2815
Sacramento, CA

SUBJECT: AIR TOXICS "HOT SPOTS" FEE REGULATION AMENDMENTS

Dear Ms. Sharpless:

The South Coast Air Quality Management District (SCAQMD) commends the efforts of the Air Resources Board (ARB) to amend the Air Toxics "Hot Spots" Fee Regulation for fiscal year 1993-94 to make fees more equitable and to meet the requirements of Senate Bill 1378, McCorquodale. SCAQMD staff worked closely with ARB staff and staff from other districts in the development of the new procedures for setting facility fees in the proposed amendments to the fee regulation. While SCAQMD staff were involved in the development of the new methodology for setting fees, and we feel that the proposed methodology is more equitable than some of the other alternatives that were considered by ARB staff, the proposed changes, in combination with the proposed state budget, severely impacts sources in the South Coast District.

The SCAQMD appreciates the reductions the state has made from the initial FY 93-94 Governors Budget that resulted in a reduction of $457,000. However, the SCAQMD will have to collect $1.9 million dollars more in state program costs compared to last year. More than half of the $1.9 million increase in the fees the SCAQMD must collect for the state is due to the proposed increase in state program costs, and the remaining is due to the new methodology used. Altogether the SCAQMD will have to increase the total fees for industries within the South Coast by more than 60% over last years fees.

In summary, the South Coast District supports the overall approach in the fee regulation amendments but feel that the SCAQMD will bear a disproportionate share of the increased state budget.

Sincerely,

Pat Leyden, for
Pat Leyden
Deputy Executive Officer, SSC

cc: ARB Board Members
James Boyd, EO, ARB
James Lents, EO, SCAQMD
Mike Scheible, ARB

(MN-hsf93)

California Council for
Environmental and
Economic Balance

100 Spear Street, Suite 805, San Francisco, CA 94105 · (415) 512-7890 · FAX (415) 512-

July 7, 1993

The Honorable Jananne Sharpless
Chairwoman
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Proposed Amendments to the Air Toxics "Hot Spots" Fee Regulation for Fiscal Year 1993-1994

Dear Ms. Sharpless:

The California Council for Environmental and Economic Balance supports the amendments to the Air Toxics "Hot Spots" Fee Regulation for Fiscal Year 1993-1994.

The proposed method for determining the fees is new and issues may arise in its implementation. However, we fully support the underlying direction of the proposal which is to move the fee program closer to a fee for service approach. CCEEB supports fees for service in the environmental regulatory arena because they promote accountability and efficiency.

As shown by the chronology listed on Page 29 of the staff report, Air Resources Board ("ARB") staff proactively sought input from districts and interested parties in numerous forums during the last year. We participated in many of these forums and appreciated your staff's openness to suggestions and requests for information. Based on these meetings there was consensus that given the anticipated streamlining in the AB 2588 program as result of the amendments that ARB adopted last month, costs for this program should decrease significantly over the next few years.

These discussions led to an effort by your staff to develop a 5-year plan for the fee program. We understand that the plan that the staff will present at ARB's July 8 meeting will accomplish a 40-percent reduction in the state costs for the program by the end of the 5th year. We are anxious to review the plan, and we commend the ARB's Stationary Source Division for coming forward with the plan at this time.

In closing, we recommend that ARB adopt the amendments.

If you have any questions, please contact Ms. Cindy Tuck at 446-3970.

Sincerely,

Victor Weisser/by CXT

VICTOR WEISSER
President

VW/CXT

cc: The Honorable James Strock
Air Resources Board Members
Mr. James Boyd
Mr. Jackson Gualco
Mr. Peter Venturini
Ms. Genevieve Shiroma
Ms. Cindy Tuck

LAW OFFICES OF WILLIAM J. THOMAS
770 L Street, Suite 1150
Sacramento, California 95814-3325
Telephone (916) 446-3970 Facsimile (916) 446-4214

FACSIMILE COVER SHEET

PLEASE DELIVER THIS TRANSMISSION TO:

NAME: G. SHIROMA

FIRM: ARB

FACSIMILE NUMBER: 327-5621

FROM: C TUCK

REGARDING: CCERB'S LETTER

DATE: 7/6/93 TOTAL NUMBER OF PAGES: 3
(INCLUDING COVER SHEET)

TIME: ~3:00pm.

ADDITIONAL MESSAGE:

HERE'S OUR LETTER. THANKS!
CINDY

Manville

93-8-2
7/8/93

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 7/7/93

XC: Bd members
JS MHS
JD SSD
JB Legal

July 7, 1993

Ms. Pat Hutchens
CARB Secretary
FAX (916)323-0764

Dear Board Members:

In light of present economic conditions, the Board's "quantum leap" (73% for Glenn County) increase in fees is very unreasonable. CARB has chosen to penalize businesses that make a sizeable contribution to the California economy. Toxic Hot Spots requirements have turned into an administrative disaster with little benefit to the environment. Now you are asking industry to fund the fiasco.

When a business is forced to pay $30,000 for a risk assessment and another $10,000 in fees it's time to think about laying off employees to compensate for the new costs. Industry in California must compete in national and international markets to survive. If increased fees are not off-set, California industry is at a disadvantage and the state will lose in the long run.

I request that the Board reconsider the increase in fees, especially with respect to the smaller districts that have a minimal number of sources to share the burden.

Sincerely,

Ron Greenberg

Ron Greenberg
Manager, Plant Safety & Environment
Co-Chairman Industrial Coalition Committee

Manville Building Insulation
P.O. Box 904
Willows, CA 95988
Tel 916 934-7751

A Division of Schuller International

MANVILLE BUILDING INSULATION
A Division of

SCHULLER INTERNATIONAL, INC.

FACSIMILE TRANSMISSION COVER SHEET

_____ CHECK HERE IF URGENT DELIVERY

TO (COMPANY NAME): CARB

ATTENTION: Pat Hutchens

FAX NUMBER: (916) 323-0764

FROM: Ron Greenberg

COMPANY NAME: Schuller International, Inc. - Willows, CA

FAX NUMBER: (916) 934-6287

DATE: 7/7/93

NUMBER OF PAGES: 2 (INCLUDING COVER SHEET)

COMMENTS: For consideration at the Public Meeting 7/8/93 on Air Toxic Hot Spots Fee Regulation.

CALIFORNIA COTTON GINNERS ASSOCIATION

1900 N. Gateway Blvd. - Suite 156
Fresno Airport Center
Fresno, California 93727
Telephone 209 / 252-0684
Fax 209 / 252 - 0551

July 7, 1993

Mr. Peter Venturini
Chief, Stationary Source Division
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD
P.O. Box 2815
Sacramento, CA 95812

(20)

Re: Proposed AB2588 Fee Regulation for Fiscal Year 93/94 - Section 90704 (a)

Dear Mr. Venturini,

We would like to commend you and your staff on the effort that has been put forth in cooperating with industry in the San Joaquin Valley in regards to the proposed fee regulation for AB2588 - The Air Toxics "HOT SPOTS" Information and Assessment Act of 1987. The work that your staff has done in communicating and working with us is greatly appreciated. There have many areas of discussion between the ARB and industry. One of those areas is in Section 90704 (a) of the proposed fee regulation.

It is proposed that Section 90704 (a) be modified to delete the requirement of an "annual adoption" of the state board fee schedule for those Districts for which ARB was adopting the fees. We are concerned with this wording, based on the following. Each year District and State costs will change, which in turn should change the fees accordingly. However, with the proposed rule changes, the requirement for a new fee schedule to be developed could be bypassed. We suggest that the this section remain the same as it was in the current Fiscal Year 92/93 Fee Regulation as follows:

90704. State Board Adoption of Fees.

(a) The State Board shall annually adopt a fee schedule which assesses a fee upon the operators of facilities subject to this regulation, and which identifies and provides for the recovery of both state costs and district costs to administer and implement the Act pursuant to Section 90700(b), for facilities located in districts that have completed all of the following requirements:

100% COTTON

The interpretation of the proposed rule is what concerns us. By leaving the sections as it currently is, will eliminate that concern. It is my understanding that our suggestion has been considered by your staff and will be incorporated at the July 8 hearing. If this section is modified back to its original form, as we propose above, then all of our concerns will have been addressed and we can support the board adoption of the proposed fee regulation.

Again, we would like to thank Genevieve, Janette, and the rest of your staff for their cooperation with the agricultural industry. Should you have any questions concerning this issue please feel free to contact me at (209)252-0728.

Sincerely,

Roger A. Isom

Roger A. Isom
California Cotton Ginners Assn.

c: Genovieve Shiroma, ARB
Janette Brooks, ARB
K.B. Smith, California Cotton Ginners Assn.
Manuel Cunha, Nisei Farmers League
Dennis Tristao, Chair, CCGA Environmental Committee
Tom Vogel, California Feed and Grain Assn.

CALIFORNIA COTTON GINNERS ASSOCIATION

1900 N. Gateway Blvd. - Suite 156
Fresno Airport Center
Fresno, California 93727
Telephone 209 / 252-0684
Fax 209 / 252 - 0551

FAX Transmission Sheet

of pages: 3
(including cover)

Date: July 7, 1993

To: Janette Brooks

Company: AIR RESOURCES BOARD

Fax #: (916)327-5621

From: Roger A. Isom RE

Phone: (209)252-0684

Fax: (209)252-0551

Comments: *Attached is our letter concerning the proposed 93/94 AB2588 Fee Regulation. Thanks for your work, Janette.*

100% COTTON

SACRAMENTO AIR QUALITY MANAGEMENT DISTRICT

TOXIC AIR POLLUTANT EMISSION INVENTORY

FOR SACRAMENTO COUNTY

JUNE 1993

Prepared by:
Karen B. Kelley, Air Toxics Specialist

Reviewed by:
Jorge DeGuzman, Air Quality Engineer

TABLE OF CONTENTS

Introduction

The primary purpose of this Air Toxics Emission Inventory is to identify toxic emissions sources of potential concern and to assist in the District's compliance with AB2588, The Air Toxics "Hot Spots" Information and Assessment Act. This inventory was derived from the Emission Inventory Reports submitted by facilities under the "Hot Spots" Act for 1989.

Criteria Used For This Inventory

Introduction

Three criteria were used to select those facilities included in this inventory.

Criteria I

All facilities which released 10 tons per year or more of total organic gases, particulate matter, nitrogen oxides, or sulfur oxides.

Criteria II

All other facilities listed in the June 1990 Toxic Air Pollutant Emission Inventory for Sacramento County which reported any listed substance at or above the applicable degree of accuracy as specified in the Emission Inventory Criteria and Guidelines Regulation Pursuant To The Air Toxics "Hot Spots" Information and Assessment Act of 1987.

Criteria III

All drycleaners located in Sacramento County. An industrywide report based on 1990 emissions from drycleaners was compiled by the Sacramento Metropolitan Air Quality Management District.

Facilities Selected Using The Criteria

Selected facilities

This table shows the number of facilities selected using the criteria.

Criteria	Description	# of facilities
I	≥ 10 TPY (1991 criteria pollutant inventory)	53
II	≥ applicable degree of accuracy (1989 report)	47
III	drycleaners in Sacramento County (1990)	103
	Total	203

Exempted

There were 17 facilities that were on the June 1990 Toxic Inventory exempted from this inventory for the following reasons:

- Eleven facilities had no emissions at or above the applicable degree of accuracy,
- Five facilities went out of business and,
- One facility moved out of the District.

The Top 10 Substances Emitted

Introduction

Facilities were required to identify 326 substances and quantify 159 of those substances for reporting year 1989.

Substances

This table shows the top 10 substances emitted by quantity from 187 facilities reporting substance quantities.

Substance	Emissions (lbs/yr)	# of facilities
Methanol	1,025,971	18
Perchloroethylene	416,472	128
Hydrochloric acid	338,465	7
Silica, crystalline	163,416	15
Methyl chloroform	163,372	15
Gasoline vapors	145,035	34
Fluorocarbons	139,981	10
Xylenes	73,860	37
Ammonia	72,256	11
Toluene	70,078	43

Major contributors

The major contributors were...

- Procter & Gamble emitted 1,015,212 lbs/yr of methanol and
- Aerojet emitted 332,230 lbs/yr of hydrochloric acid.

Without these two facilities' contribution neither methanol or hydrochloric acid would be top 10 substances.

The Top Ten Substances Without Aerojet and Procter & Gamble

Substances

This table shows the top 10 substances emitted by quantity without Aerojet and Procter & Gamble.

Substance	Emissions (lbs/yr)	# of facilities
Perchloroethylene	416,472	128
Silica, crystalline	163,416	15
Methyl chloroform	163,372	15
Gasoline vapors	145,035	34
Fluorocarbons	139,981	10
Xylenes	73,860	37
Ammonia	72,256	11
Toluene	70,078	43
Methylene chloride	56,035	13
Hydrocyanic acid	55,628	2

Major contributor

The major contributor was...

- Grafil, Inc., a manufacturer of graphite fiber for aerospace, emitted 50940 lbs/yr of ammonia and 55607 lbs/yr of hydrocyanic acid.

Conclusion

Unique facilities

Sacramento county has a diverse group of unique facilities which emit toxic air pollutants. Three of the major contributors are facilities which cannot be categorized with any other facility in the area. Also unique to the Sacramento area are the high number of aggregate mining and processing facilities. These facilities account for the high amount of crystalline silica in the inventory.

Without the unique and aggregate facilities, Sacramento would have a predominance of solvent emissions. A predominance of solvent emissions is typical of most regions.

APPENDIX A

FACILITIES INCLUDED IN THIS INVENTORY

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

TOXIC EMISSION INVENTORY FOR 1992

6/21/93

Name	Address	City	State
1 DAY PAINT & BODY CENTER	4720 WATT AVE.	SACRAMENTO	CA
A. TEICHERT & SON	8760 KIEFER	SACRAMENTO	CA
A. TEICHERT & SON	MISSIPPI BAR	ORANGEVALE	CA
AEROJET GENERAL	AEROJET ROAD	RANCHO CORDOVA	CA
AIR PRODUCTS INC.	5025 83RD STREET	SACRAMENTO	CA
AMERICAN ENV MGT CORP (BFI)	WHITE ROCK ROAD	RANCHO CORDOVA	CA
AMERICAN RIVER AGGREGATES	PRAIRIE CITY RD/HWY 50	FOLSOM	CA
AMERICAN RIVER ASPHALT	PRAIRIE CITY RD.	FOLSOM	CA
ARDEN ANIMAL HOSPITAL	1823 FULTON AVENUE	SACRAMENTO	CA
AUBURN BLVD. VETERINARY	3132 AUBURN BLVD.	SACRAMENTO	CA
BERTOLUCCIS BODY & FENDER	1717 STOCKTON BLVD.	SACRAMENTO	CA
BLUE CROSS PET HOSPITAL	7615 FAIR OAKS BLVD.	CARMICHAEL	CA
BLUE DIAMOND GROWERS	1802 C STREET	SACRAMENTO	CA
BROADWAY TIRE INC.	3418 52ND AVENUE	SACRAMENTO	CA
CAL CENTRAL PRESS	2629 5TH STREET	SACRAMENTO	CA
CAL-FUN	12010 RIVER ROAD	COURTLAND	CA
CALIFORNIA CASCADE INDUST	7701 17TH STREET	SACRAMENTO	CA
CAMELLIA MEMORIAL LAWN		SACRAMENTO	CA
CAMPBELL SOUP COMPANY	6200 FRANKLIN BLVD.	SACARMENTO	CA
CHEVRON USA	2420 FRONT STREET	SACRAMENTO	CA
CHEVRON USA PRODUCTION CO		ISLETON	CA
COLOMBO BAKING INC.	1329 FEE DRIVE	SACRAMENTO	CA
CONCRETE PIPE & PRODUCTS CO	7020 TOKAY AVENUE	SACRAMENTO	CA
CONTINENTAL BAKING CO	1324 ARDEN WAY	SACRAMENTO	CA
CRYSTAL CREAM & BUTTER CO	1013 O STREET	SACRAMENTO	CA
CTEC INC.	3 WAYNE COURT	SACRAMENTO	CA
CUSTOM MADE PACKAGING	7640 WILBUR WAY	SACRAMENTO	CA
DECORE-ATIVE SPECIALTIES	9191 CWD CRT	ELK GROVE	CA
DORRIS LUMBER & MOULDING	2600 REDDING AVENUE	SACRAMENTO	CA
EARL SCHEIB INC.	2435 FRUITRIDGE ROAD	SACRAMENTO	CA
EARL SCHEIB INC.	2650 SUNRISE BLVD.	SACRAMNETO	CA
EARL SCHEIB INC.	3535 O STREET	NORTH HIGHLANDS	CA
EAST LAWN INC.	4300 FOLSOM BLVD.	SACRAMENTO	CA
FAIR OAKS VETERINARY	7348 FAIR OAKS BLVD	CARMICHAEL	CA
FLORIN BOX & LUMBER	7340 FRASINETTI ROAD	SACRAMENTO	CA
FOLSOM STATE PRISON	OLD PRISON ROAD	REPRESSA	CA
GEORGIA PACIFIC CORP	GRANTLINE RD/HWY 99	ELK GROVE	CA
GOLDEN WEST HOMES	9998 OLD PLACERVILLE ROAD	SACRAMENTO	CA
GOODYEAR RETREAD PLANT	147 COMMERCE CIRCLE	SACRAMENTO	CA
GRACE INDUSTRIES, INC.	9412 BIGHORN BLVD.	ELK GROVE	CA
GRAFIL INC	5900 88TH STREET	SACRAMENTO	CA
GRANITE CONSTRUCTION CO.	4191 BRADSHAW RD.	SACRAMENTO	CA
GRAPHIC CENTER	3925 POWER INN ROAD	SACRAMENTO	CA
H C MUDDOX COMPANY	4875 BRADSHAW ROAD	SACRAMENTO	CA
HFP MILLWORK	7400 SAN JOAQUIN ST.	SACRAMENTO	CA
INDUSTRIAL MINERALS COMPANY	7268 FRASINETTI ROAD	SACRAMENTO	CA

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

TOXIC EMISSION INVENTORY FOR 1992

6/21/93

Name	Address	City	State
KEYES FIBRE COMPANY	8450 GERBER ROAD	SACRAMENTO	CA
KRAMER CARTON COMPANY	1800 61ST STREET	SACRAMENTO	CA
LIFELINE DOORS INC.	8280 ELDER CREEK ROAD	SACRAMENTO	CA
MAACO AUTO PAINTING	2700 FLORIN ROAD	SACRAMENTO	CA
MAACO AUTO PAINTING	3160 ORANGE GROVE AVENUE	NORTH HIGHLANDS	CA
MATHER AIR FORCE BASE	MATHER AFB	MATHER AFB	CA
MCCLELLAN AIR FORCE BASE	MCCLELLAN AFB	MCCLELLAN AFB	CA
MCCLELLAN AIR FORCE BASE/SMUD	MCCLELLAN AFB	SACRAMENTO	CA
MICHAELS COMPANY	5849 83TH STREET	SACRAMENTO	CA
MIRACLE AUTO PAINTING	2415 MERCANTILE DRIVE	SACRAMENTO	CA
MIRACLE AUTO PAINTING	5933 AUBURN BLVD.	CITRUS HEIGHTS	CA
MIRACLE AUTO PAINTING	6161 STOCKTON BLVD.	SACRAMENTO	CA
MIRACLE AUTO PAINTING	998 ARDEN WAY	SACRAMENTO	CA
MOUNT VERNON MEMORIAL	8201 GREENBACK LANE	FAIR OAKS	CA
NORTH SACTO FUNERAL HOME	725 EL CAMINO AVENUE	SACRAMENTO	CA
P G & E	BRANNAN ISLAND	ISLETON	CA
PALM IRON WORKS	8845 ELDER CREEK ROAD	SACRAMENTO	CA
PINES VEHICLE PAINTING	6290 WAREHOUSE WAY	SACRAMENTO	CA
PROCTER & GAMBLE	8201 FRUITRIDGE ROAD	SACRAMENTO	CA
PROGRESSIVE CIRCUIT PROD	4361 PELL DRIVE	SACRAMENTO	CA
PUENTE WOOD PRODUCTS	11363 FOLSOM BLVD.	RANCHO CORDOVA	CA
R. C. COLLET INC.	900 WEST ELKHORN BLVD.	RIO LINDA	CA
RADIATOR SPECIALTIES	8441 SPECIALTY CIRCLE	SACRAMENTO	CA
RAINBO BAKING COMPANY	3211 6TH AVE.	SACRAMENTO	CA
REGIONAL SANITATION DIST	8521 LAGUNA STATION ROAD	ELK GROVE	CA
RMC LONESTAR	3145 KILGORE ROAD	RANCHO CORDOVA	CA
SACRAMENTO AGGREGATES	5411 MAYHEW ROAD	SACRAMENTO	CA
SACRAMENTO ARMY DEPOT	8350 FRUITRIDGE ROAD	SACRAMENTO	CA
SACRAMENTO BEE	2100 Q STREET	SACRAMENTO	CA
SACRAMENTO CNTY CREMATORY	6201 FAIR OAKS BLVD.	SACRAMENTO	CA
SACRAMENTO MEMORIAL LAWN	6100 STOCKTON BLVD.	SACRAMENTO	CA
SACRAMENTO PET CEMETERY	9558 GERBER ROAD	SACRAMENTO	CA
SACRAMENTO RENDERING CO	11350 KEIFER BLVD.	SACRAMENTO	CA
SACRAMENTO UNION	301 CAPITOL MALL	SACRAMENTO	CA
SACRAMENTO WINDOW SPECIAL	1453 BLAIR AVENUE	SACRAMENTO	CA
SANTA FE PIPE LINES	2901 BRADSHAW	RANCHO CORDOVA	CA
SETZER FOREST PRODUCTS	2556 3RD STREET	SACRAMENTO	CA
SIERRA QUALITY CANNERS (TRI-VAL	426 NORTH 7TH STREET	SACRAMENTO	CA
SOUTHERN PACIFIC TRANS	401 I STREET	SACRAMENTO	CA
STATE OF CAL FISH & GAME	1701 NIMBUS ROAD, SUITE A	RANCHO CORDOVA	CA
STATE OF CALIF - CENTRAL PLANTS	625 Q STREET	SACRAMENTO	CA
STATE OF CALIF PRINTING	344 N 7TH STREET	SACRAMENTO	CA
SUTTER GENERAL HOSPITAL	2801 L STREET	SACRAMENTO	CA
SWANSONS CLEANERS	2121 ARDEN WAY	SACRAMENTO	CA
TAYLOR CABINETS INC.	9974 HORN ROAD	SACRAMENTO	CA
TELEDYNE MEC	11361 SUNRISE PARK DRIVE	RANCHO CORDOVA	CA

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

TOXIC EMISSION INVENTORY FOR 1992

6/21/93

Name	Address	City	State
THUNDERBIRD MOULDING CO.	6001 POWER INN ROAD	SACRAMENTO	CA
TOSCO REFINING COMPANY	66 BROADWAY	SACRAMENTO	CA
UCD MEDICAL CENTER	2300 45TH STREET	SACRAMENTO	CA
UNOCAL COMPANY	76 BROADWAY	SACRAMENTO	CA
WEMCO(ENVIROTECH SPECIALTYPUMPS	721 NORTH B STREET	SACRAMENTO	CA
WILLAMETTE INDUSTRIES	8333 24TH AVENUE	SACRAMENTO	CA
WOODMARK MANUFACTURING	2701-B LAND AVENUE	SACRAMENTO	CA
WORTHINGTON CHEVROLET	7100 FRANKLIN BLVD.	SACRAMENTO	CA

APPENDIX B

DRYCLEANERS INCLUDED IN THIS INVENTORY

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Company		Address	City	Descript
A-SILK DRY CLEANERS	2933	WALNUT AV	CARMICHAEL	DRYCLEANING UNIT PERC
ALHAMBRA DRY CLEANERS	1000	ALHAMBRA BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
ALLENS CLEANERS	5163	MADISON AVE	SACRAMENTO	DRYCLEANING UNIT PERC
ALOHA CLEANERS	3309	JULLIARD DR	SACRAMENTO	DRYCLEANING UNIT PERC
AMERICAN CLEANER	639	E BIDWELL ST	FOLSOM	DRYCLEANING UNIT PERC
APOLLO CLEANERS	1326	FULTON AV	SACRAMENTO	DRYCLEANING UNIT PERC
ARDEN FAIR CLEANERS	1633	ARDEN WAY	SACRAMENTO	DRYCLEANING UNIT PERC
ARDEN PLAZA CLEANERS	4373	ARDEN WAY	SACRAMENTO	DRYCLEANING UNIT PERC
ARNOLD PALMER CLEANING CE	4338	ARDEN WAY	SACRAMENTO	DRYCLEANING UNIT PERC
BELWIN CLEANERS	8251	ALPINE AVE #A	SACRAMENTO	DRYCLEANING UNIT PERC
BILL'S CLEANERS	4102	MANZANITA AVE	CARMICAHEL	DRYCLEANING UNIT PERC
CAMELLIA ENTERPRISES	5901	FOLSOM BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
CAMPUS CLEANERS	69	UNIVERSITY AVE	SACRAMENTO	DRYCLEANING UNIT PERC
CAROUSEL CLEANERS	5019	STOCKTON BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
CHRIS LIN & COMPANY	8033	GREENBACK LN	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
CLASSIC CLEANERS	4405	ELKHORN BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
CLEANERS PLUS	8567	ELK GROVE BLVD	ELK GROVE	DRYCLEANING UNIT PERC
CLEANING CIRCUS	3213	MARYSVILLE BL	SACRAMENTO	DRYCLEANING UNIT PERC
COPPERWOOD CLEANERS	7024	SUNRISE BLVD	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
COUNTRY CLUB CLEANERS	2612	WATT AVE	SACRAMENTO	DRYCLEANING UNIT PERC
COUNTRY OAKS CLEANERS	8711	ELK GROVE BLVD	ELK GROVE	DRYCLEANING UNIT PERC
CREEKSIDE CLEANERS	6051	GREENBACK LANE	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
CRESTVIEW ONE HOUR MART	4788	MANZANITA AVE	CARMICHAEL	DRYCLEANING UNIT PERC
CROWN CLEANERS	5541	H ST	SACRAMENTO	DRYCLEANING UNIT PERC
CUFF & COLLAR CLEANERS	9671	FOLSOM BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
CURLY'S CLEANERS	7424	SUNSET AVE	FAIR OAKS	DRYCLEANING UNIT PERC
CURLY'S CLEANERS	6013	WATT AVE	NORTH HIGHLANDS	DRYCLEANING UNIT PERC
CURLY'S ELITE CLEANERS	7101	FRANKLIN BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
D & L CLEANERS	825	C ST	GALT	DRYCLEANING UNIT PERC
D & L CLEANERS	7875	LICHEN DR	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
D'LYNNS CLEANERS	7901D	FAIR OAKS BLVD	CARMICHAEL	DRYCLEANING UNIT PERC
DESERET INDUSTRIES	3000	AUBURN BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
DRY CLEAN TODAY	6818	FAIR OAKS BLVD #2	CARMICHAEL	DRYCLEANING UNIT PERC
DRYCLEAN 4-U	5134	ARDEN WAY	CARMICHAEL	DRYCLEANING UNIT PERC
DRYCLEAN USA	7467	RUSH RIVER DR, #170	SACRAMENTO	DRYCLEANING UNIT PERC
DUFFYS CLEANERS	4643	FREEPORT BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
FABRICARE	5800	MADISON AVE	SACRAMENTO	DRYCLEANING UNIT PERC
FAIR OAKS ONE HOUR MART	9729A	FAIR OAKS BLVD	FAIR OAKS	DRYCLEANING UNIT PERC
FAIRMONT CLEANERS	511	BROADWAY	SACRAMENTO	DRYCLEANING UNIT PERC
FASHION CLEANERS	2458	AVALON DR	SACRAMENTO	DRYCLEANING UNIT PERC
FLORIN CLEANERS	6612	FLORIN RD	SACRAMENTO	DRYCLEANING UNIT PERC
FOLSOM CLEANERS	316	E BIDWELL ST	FOLSOM	DRYCLEANING UNIT PERC
FREEPORT CLEANERS	2001	4TH AVE	SACRAMENTO	DRYCLEANING UNIT PERC
GEORGES CLEANERS	5911	WATT AVE	NORTH HIGHLANDS	DRYCLEANING UNIT PERC
GRAND OAKS SUNSHINE CNTR	8104	AUBURN BLVD	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
GREENBACK CLEANERS	7347	GREENBACK LANE	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
HAZEL CLEANERS	4309	HAZEL AVE	FAIR OAKS	DRYCLEANING UNIT PERC

Company		Address	City	Descript
HILLSDALE CLEANERS	5739	HILLSDALE BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
HUGGINS CLEANERS	1347C	FLORIN RD	SACRAMENTO	DRYCLEANING UNIT PERC
HYLERS CLEANERS	6342	FAIR OAKS BLVD	CARMICHAEL	DRYCLEANING UNIT PERC
HYTONE CLEANERS	4943	FOLSOM BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
IRENES FOOTHILL CLEANERS	7036	SYLVAN RD	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
J & J CLEANERS	1385	FLORIN RD	SACRAMENTO	DRYCLEANING UNIT PERC
JERRYS CLEANERS	4921	47TH AVE	SACRAMENTO	DRYCLEANING UNIT PERC
KINGS CLEANERS	8876	VINTAGE PARK DR #107	SACRAMENTO	DRYCLEANING UNIT PERC
L CO QUALITY CLEANERS	6955A	STOCKTON BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
LA RIVIERA CLEANERS	8718	LA RIVIERA DR	SACRAMENTO	DRYCLEANING UNIT PERC
LAND PARK CLEANERS	5862	SOUTH LAND PARK DR	SACRAMENTO	DRYCLEANING UNIT PERC
LEIBELS CLEANERS	10679	FOLSOM BLVD	RANCHO CORDOVA	DRYCLEANING UNIT PERC
LITTLES CLEANERS	1046	FLORIN RD	SACRAMENTO	DRYCLEANING UNIT PERC
MADISON AVENUE CLEANERS	5412	MADISON AVE #100	SACRAMENTO	DRYCLEANING UNIT 1,1,1-TCA
MARCONI & WATT CLEANERS	3512	MARCONI AVE	SACRAMENTO	DRYCLEANING UNIT PERC
MARKS CLEANERS	5619	FREEPORT BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
MCKENRY DRAPERY SERVICE	6325	FAIR OAKS BLVD	CARMICHAEL	DRYCLEANING UNIT PERC
MCKENRY DRAPERY SERVICE	8974	GREENBACK LN	ORANGEVALE	DRYCLEANING UNIT PERC
MERCURY CLEANERS	1419	16TH ST	SACRAMENTO	DRYCLEANING UNIT PERC
ONE HOUR MARTINIZING	1441	FULTON AVE	SACRAMENTO	DRYCLEANING UNIT PERC
ORCHID CLEANERS	6424	STOCKTON BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
PARK PLACE CLEANERS	701	E BIDWELL ST #1	FOLSOM	DRYCLEANING UNIT PERC
PAULS CLEANERS	7115	SOUTH LAND PARK DR	SACRAMENTO	DRYCLEANING UNIT PERC
RAPID CLEAN DRY CLEANERS	9353	GREENBACK LN	ORANGEVALE	DRYCLEANING UNIT PERC
RAYMONDS CLEANERS	2437	FAIR OAKS BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
RICOS DRAPERY CLEANERS	9893	HORN RD	SACRAMENTO	DRYCLEANING UNIT PERC
RIVER CITY CLEANERS	4700	MACK RD #4	SACRAMENTO	DRYCLEANING UNIT PERC
RIVER CLEANERS	2286	SUNRISE BLVD #1	RANCHO CORDOVA	DRYCLEANING UNIT PERC
RIVER TERRACE DRAPERY	2735	RIVERSIDE BLVD	SACRAMENTO	DRYCLEANING UNIT PETROLEUM
RYTINA INC	2525	YORKTOWN AVE	SACRAMENTO	DRYCLEANING UNIT PERC
SAVE ON DRY CLEANERS	76128	GREENBACK LANE	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
SAVE-ON CLEANERS	7850	STOCKTON BLVD #190	SACRAMENTO	DRYCLEANING UNIT PERC
SAVE-ON CLEANERS #2	823	HOWE AVE	SACRAMENTO	DRYCLEANING UNIT PERC
SERVICE CLEANERS	8875	GREENBACK LN	ORANGEVALE	DRYCLEANING UNIT PERC
SIERRA SUEDE & LEATHER	1625	DEL PASO BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
SKY CLEANERS	6136	SUNRISE MALL	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
SOUTHGATE CLEANERS	7131	GOVERNERS CIRCLE	SACRAMENTO	DRYCLEANING UNIT PERC
STARR CLEANERS	9419	MADISON AVE	ORANGEVALE	DRYCLEANING UNIT PERC
STERLING CLEANERS	2417	BROADWAY	SACRAMENTO	DRYCLEANING UNIT PERC
STILSON BROS CLEANERS	3519	BROADWAY	SACRAMENTO	DRYCLEANING UNIT PETROLEUM
STOPWATCH CLEANERS	6705	WINDING WAY	FAIR OAKS	DRYCLEANING UNIT PERC
SUN CLEANERS	8959	FOLSOM BLVD	SACRAMENTO	DRYCLEANING UNIT PERC
SUNRISE & OLD AUBURN CLNR	7601	SUNRISE BLVD	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
SUNRISE CLEANERS	7837	MADISON AVE	CITRUS HEIGHTS	DRYCLEANING UNIT PERC
SUNSHINE CENTER	4317	MARCONI AV	SACRAMENTO	DRYCLEANING UNIT PERC
SWANSONS CLEANERS	7680	GREENBACK LANE	SACRAMENTO	DRYCLEANING UNIT PERC
SWANSONS CLEANERS	5211	MADISON AVE	SACRAMENTO	DRYCLEANING UNIT FREON

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Company		Address	City	Descript
SWANSONS CLEANERS	5211	MADISON AVE	SACRAMENTO	DRYCLEANING UNIT PERC
SWISS CLEANERS	2308	FLORIN RD	SACRAMENTO	DRYCLEANING UNIT PERC
TILLETT CLEANERS	5050	FRUITRIDGE RD	SACRAMENTO	DRYCLEANING UNIT PERC
TOP HAT CLEANERS	6496	BRDADWAY	SACRAMENTO	DRYCLEANING UNIT PERC
VETERANS CLEANERS	10161	FOLSOM BLVD	RANCHO CORDOVA	DRYCLEANING UNIT PERC
VILLAGE CLEANERS	2709B	MARCONI AVE	SACRAMENTO	DRYCLEANING UNIT PERC
VILLAGE CLEANERS	49J	NATOMA ST	FOLSOM	DRYCLEANING UNIT PERC
VOGUE DRY CLEANERS	2750	MARCONI AVE	SACRAMENTO	DRYCLEANING UNIT PERC
WOODARD CLEANERS	2201	J ST	SACRAMENTO	DRYCLEANING UNIT PETROLEUM
X CEL CLEANERS	3110	ARDEN WAY	SACRAMENTO	DRYCLEANING UNIT PERC

NORMAN D. COVELL
Air Pollution Control Officer

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

RICHARD G. JOHNSON
Assistant Air Pollution Control Officer

TO: ROGER KORENBERG
AIR RESOURCES BOARD

DATE: July 7, 1993
TIME: 3:00PM

FAX NUMBER: (916) 327-5621

FROM: KAREN KELLEY

AIR TOXICS SPECIALIST

FAX NUMBER: (916) 386-6674

NUMBER OF PAGES TO FOLLOW: 15

INSTRUCTIONS/MESSAGE: ATTACHED IS THE INFORMATION YOU REQUESTED.

916-386-6650 • FAX 916-386-6674 • SMAQMD • 8411 Jackson Rd. • Sacramento CA 95826

YOLO SOLANO AIR POLLUTION CONTROL DISTRICT

1947 Galileo Ct., Suite 103
Davis, CA 95616
(800) 287-3650
(916) 757-3650
(916) 757-3670 FAX

May 6, 1993

James Boyd
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

SUBJECT: AIR TOXICS "HOT SPOTS" FEE REGULATION

Dear Jim,

Upon reviewing ARB's and OEHHA's proposed FY 93/94 budget for the Air Toxics "Hot Spots" program, the District has serious concerns that consideration was <u>not</u> given to streamlining the program and, consequently the budget, to reflect program and staffing cutbacks that are necessarily occurring throughout California's businesses, industries and regulatory agencies. Air districts across the State are reducing program costs in an attempt to keep fees from increasing and adversely impacting business, yet ARB and OEHHA are proposing to increase their budget by 62%. We agree with SMAQMD that this is contrary to the State's financial crisis and current California business climate.

In light of the fact that the proposed 93/94 fee regulation specifies an increase of 400% in the District's share of state costs from approximately $10,000 in 92/93 to $50,000 in 93/94, the District will be unable to pass this increase along to affected industry and will, therefore, have to absorb the increased costs. As you may be aware, last year, the District revised it's fee regulation to recover costs associated with implementation of the stationary source permit program. This process was very difficult and controversial, as the District had not increased its fees since 1978. We are still recovering from the fallout due to this necessary increase. Therefore, the industries located in the District simply will not tolerate a fee increase of the magnitude proposed by the State.

For some time now, APCD's and industry have been requesting detailed information as to the actual and specific expenditures the State has proposed in determining the need for increases to the AB2588 budget. On April 21, 1993, some information was faxed to districts that participated on the Air Toxics "Hot Spots" Fee Regulation Committee. This information was forwarded to YSAPCD by SMAQMD.

Upon continuing discussions with SMAQMD and considering the tight time-frame we are working with I would like to take this opportunity to concur with the comments made by Norm Covell in the letter and attachment sent to you dated April 28, 1993.

Thank you for this opportunity to comment. If you have any questions, please call me at (916)757-3675 or Annette Carruthers, of my staff, at (916)757-3659.

Sincerely,

Kenneth [illegible]ver
Air Pollution Control Officer

cc: Norm Covell, SMAQMD
Peter Venturini, CARB
Stewart Wilson, CAPCOA
✓Genevieve Shiroma, CARB

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NORMAN D. COVELL
Air Pollution Control Officer

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

RICHARD G. JOHNSON
Assistant Air Pollution Control Officer

April 28, 1993

James Boyd
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: AIR TOXICS "HOT SPOTS" FEE REGULATION

Dear Mr. Boyd:

As you know, the cost of complying with environmental laws and regulations is one of the primary reasons industry claims for not siting in California or moving their operations to other states. California is currently facing a financial crisis and we, as environmental regulators, play a very important role in the financial recovery of the State. The District has serious concerns with the ARB's and OEHHA's proposed FY 1993/94 budget for the Air Toxics "Hot Spots" program and how it will affect California's economy.

Air districts across the State are vigorously trying to reduce the cost of their programs, yet, ARB and OEHHA are proposing to increase their budget by 62%. This is contrary to California's financial crisis. We strongly urge that ARB perform a socio-economic impact study on the proposed fee regulation.

For some time now, the districts and industry have been requesting a detailed description of ARB's and OEHHA's budget information such as staffing requirements and allocation of time and funds. Although, some information was faxed to the districts on April 21, the districts (and industry) haven't had sufficient time to fully review this information. Therefore, the District requests an extension of the comment period. The request is based on the following:

1. The budget information requested months ago, was given to the districts and a few industry representatives on April 21, allowing very little time for review and comment.

2. The budget information submitted is still incomplete and generates more questions than answers.

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A preliminary review of ARB's/OEHHA's proposed FY 1993/94 budget and time/money allocations was performed by District staff. The District's comments and concerns are enclosed for your consideration.

Thank you for the opportunity to comment and I look forward to your response. If you have any questions, please contact Jorge DeGuzman at (916) 386-7027.

Sincerely,

Norman D. Covell
Air Pollution Control Officer

cc: Dick Johnson, SMAQMD
Bruce Nixon, SMAQMD
Bob Smith, Sac. County Executive
Grantland Johnson, Chairman, APC Board
Peter Venturini, ARB
Genevieve Shiroma, ARB
Stewart Wilson, CAPCOA
George Alexeeff, OEHHA/ATES
Melanie Marty, OEHHA/ATES
Cindy Tuck, CCEEB
Fee Regulation Committee Members (fax)

Enclosures

G:\EGRIWP\ADFEE TOX

SMAQMD's COMMENTS AND CONCERNS
ARB's/OEHHA's PROPOSED FY 1993/94 AIR TOXICS "HOT SPOTS" BUDGET

General Questions:

1. If ARB and OEHHA were able to function with a 10% reduction in their budgets last year and no real lack of service was noticed, why do they have to recover the 10% this year to perform less work than last year?

2. The streamlined biennial up-date will reduce ARB's workload tremendously. Has this been taken into consideration?

3. The District would like to see a written legal interpretation of the applicable section in the Health and Safety Code that allows ARB/OEHHA to collect $1,900,000 for implementation of SB-1731.

ARB's Proposed Budget:

1. Regulatory Development & Implementation of AB-2588:

   ARB has allocated 3 person years (PYs) for regulatory development and implementation of AB-2588. Since the program has been in place for several years now, and new guidelines have already been drafted, it is not clear what these three PYs will be doing. There will be some work associated with the streamlining efforts but certainty not 6,240 hours worth.

   Please explain the different tasks that these 3 PYs will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

2. Methods Development and Review:

   ARB has allocated 5 PYs for methods development and review. Again, the AB-2588 program has been in place for some time now and most of the methods needed to implement the program have already been developed.

   ARB is proposing to create emissions factors to be used in lieu of source testing. However, most facilities required to perform source tests have already done so and have developed emission factors for their specific equipment and process parameters, which is more accurate and cost effective than what ARB proposes. Also, the Air Toxics "Hot Spots" Information and Assessment Act of 1987, does not require the

ARB to create emission factors based on the source test data gathered under the AB-2588 program.

Please explain the different tasks that these 5 PYs will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

3. Air Toxics Emissions Database:

ARB has allocated 4 PYs and $175,000 in contracts for the air toxics emissions database. As of 01/28/93, there are a total 7,381 facilities in the state submitting AB-2588 reports (phases I, II, and III). Assuming 50% of the facilities need to submit reports during the 1993/94 fiscal year (most of them being biennial updates), it will cost ARB an average of $122.20 per facility to update the information as needed. It should also be noted that because of the streamlined biennial updates (proposed Section 93348, H&S Code) the data entry work load will be reduced dramatically. Any work other than data entry associated with the database (system maintenance, etc.) should be minimal since the system has been in operation for some time now.

Please explain the different tasks that these 4 PYs and the contract positions will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

4. Emissions Data Collection, Validation:

ARB has allocated 5 PYs and $164,000.00 in contracts for emissions data collection and validation. The districts do all the data collection. It is not clear what ARB's role is in the data collection process. The need to validate the data on a continuous basis (for every update) seems unnecessary since most facilities have insignificant changes from year to year. Data validation on updates should be limited to reports showing significant changes in emissions from the previous report.

Please explain the different tasks that these 5 PYs and the contract positions will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

5. Risk Assessment:

H&SC, Section 44361, allows for the districts to seek assistance from the ARB as necessary to adequately evaluate the emissions impact and modeling data contained within the risk assessment. However, ARB's role during fiscal year 1993/94 is expected to be insignificant based on the following:

a) Only a small fraction of the risk assessments reviewed by the districts require further review by ARB.

b) Most facilities required to prepare risk assessments have already done so and have submitted them to the districts.

ARB has allocated 3 PYs for risk assessments. It is not clear what the responsibilities will be for these 3 PYs.

Please explain the different tasks that these 3 PYs will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

6. Assist Districts & Facilities with Public Notification Procedures & Public Meetings:

ARB has allocated 3 PYs to assist districts and facilities with the public notification procedures and public meetings. The public notification procedures have already been prepared by the AB- 2588 Risk Assessment Committee of the California Air Pollution Control Officers Association, in consultation with OEHHA and ARB.

It is estimated that approximately 26 facilities statewide will need to notify the public (as per ARB's spreadsheet titled "Facility Counts by Program Category as of 01/28/93"). Based on the response to the written notifications, the districts will determine if the facility must hold a public meeting. Each public meeting is expected to last approximately two hours. Assuming all 26 notifications require public meetings and ARB's presence is requested for each public meeting, ARB staff would be spending six weeks (240 hours) per public meeting (based on 3 PYs). In other words, it would cost at least $8,000.00 to have an ARB representative present at one of these meetings. This seems extremely high. It should not take ARB staff more than 8 hours to prepare for each of these public meetings.

Please explain the different tasks that these 3 PYs will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

7. Develop Risk Reduction Guidelines and Checklists:

ARB has allocated 5 PYs to develop risk reduction guidelines and checklists. As per ARB's FY 1993/94 program cost analysis (page titled "Facility Counts by Program Category as of 01/28/93), there will be approximately seven facilities subject to SB-1731 during FY-1993/94. ARB's proposed PYs for developing risk reduction guidelines and checklists will cost $55,857 per facility.

ARB states that as many as 500 facilities statewide could be determined by the districts to pose a significant health risk (once all three phases of the program are complete). However, the majority of these facilities will fall under a common source category (i.e; gas stations, dry cleaners).

ARB estimates that 5 PYs will be needed to produce two risk reduction guidelines per year. That is equivalent to almost $200,000 per risk reduction guideline. How is this going to benefit small facilities?

Please explain the different tasks that these 5 PYs will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

OEHHA's Proposed Budget:

1. Health Risk Assessment Review:

OEHHA has allocated 5 PYs and $500,000 for the review of health risk assessments. It is not clear why it will cost OEHHA a total of $879,000 to review 330 risk assessments (that's over $2,600 per risk assessment). The districts (with ARB's guidance in some cases) review the risk assessments for adequacy of the modeling data contained in the risk assessment and consistency with the CAPCOA Risk Assessment Guidelines. Also, many of the risk assessments were done using ARB's or Santa Barbara APCD's computerized risk assessment programs. OEHHA's role in the risk assessment review process should not be that complicated.

Also H&SC, Section 44361(c) states: "The District shall reimburse the State Department of Health Services or qualified independent contractor designated by the State Department of Health Services pursuant to subdivision (b), within 45 days of its request, for its actual costs incurred in reviewing a health risk assessment pursuant to this section." Subdivision (d) of this section allows OEHHA to collect money from the districts in the same manner as above for consultation regarding risk assessments. H&SC, Section 44380.5 allows the district, ARB & OEHHA to assess a supplemental fee upon the operator of a facility that submits supplemental information pursuant to paragraph (3) of subdivision (b) of Section 44360 of the H&S Code in a health risk assessment. OEHHA should use this approach for reimbursements.

Please explain the different tasks that these 5 PYs and the contract positions will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.). How long does it take OEHHA to review a risk assessment and what do they look for?

2. Develop Health Guidance Values, Noncancer Methods, Acute Effect Database:

Please explain the different tasks that these 6 PYs and the contract positions will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

3. Participate in Public Notification Hearings:

As mentioned earlier, 26 facilities are expected to have to notify the public. If OEHHA is requested to be present at the public hearings (assuming a public hearing is required), it would be to offer their expertise in toxicology, something they should know fairly well and not require a lot of preparation. It is hard to believe that a full-time position (1 PY) is required to have someone represent OEHHA in a maximum of 26, 2-hour public workshops.

Please explain the different tasks that this 1 PY will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

4. Evaluate Risk Reduction Audits and Plans:

H&SC, Section 44390(f) specifically requires the districts to review the audit/plans not OEHHA. It is not clear why OEHHA is proposing to allocate 3 PYs for something that will be handled at district level.

Please explain the different tasks that these 3 PYs will be doing, the estimated volume of work associated with each task, time required to do each task, and the amount of expertise needed (entry level, associate, engineer, specialist, etc.).

The Daily Democrat
Serving All Of Yolo County Since 1857
Woodland, California
Thursday, February 11, 1993

Businesses blast air fees

Dan McGarry of G&R Auto in Davis and Hank Larmuseau of River City Petroleum in West Sacramento, in the second row left to right, and John Hahn of Davis Waste Removal in the front row, foreground, listen to testimony about fee increases of as much as 2,000 percent imposed by the Yolo-Solano Air Pollution Control District. Dozens of people from industrial businesses in Yolo and Solano counties expressed anger over the fees at a meeting in Davis.

Steve Garman/The Daily Democrat

Bryant Stocking

Others call Air District 'very cooperative'

By ADAM STEINHAUER
Democrat Staff Writer

Business people packed a meeting Wednesday in Davis to demand that local air pollution officials roll back fees that have gone up as much 2,000 percent this year and cease their alleged "Gestapo tactics."

Officials with the Yolo-Solano Air Pollution Control District dismissed unproven talk of "Gestapo tactics" as mere rhetoric meant only to embarrass their organization.

But for the first time, five newly seated directors of the air district — county supervisors from Yolo and Solano counties — publicly heard from business people affected by the large fee increases imposed by the district last year.

"The (California) Clean Air Act, as it was signed by Gov. Wilson, was never intended to create a bureaucracy. It was meant to clean the air," said Bryant Stocking, of the B.C. Stocking Distributing Co.

"Our district has chosen to raise fees to build a staff to go out and compile data ... and then to create a program to reduce emissions," he said.

Stocking said that he was speaking for an organized association of air district permit holders.

And with some dissenters in the crowd of more than 200 at the Davis City Council chambers, many of the business people who followed Stocking repeated his theme — that for fees that were raised hundreds or thousands of dollars last year, business people are not getting cleaner air in return.

Under the California Clean Air Act, the Yolo-Solano Air Pollution Control District must reduce pollution by 50 percent by the year 2010.

The two counties have levels of ozone in their air that are considered "severe" under state standards.

And under federal clean air law, the clean air program must be paid for by polluters.

The air district has planned to hire four new supervisorial-level staffers this year to help the district catch up with the tightening clean air restrictions.

As many as 50 percent of the two counties' businesses do not

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Air

Continued from Page 1

have up-to-date air district permits, according to Air Pollution Control Officer Ken Selover.

The Leer West camper shell factory in Woodland was one of the businesses out of compliance, until recent months.

Ron Towry, president of Leer West, spoke in defense of the air district.

"I get the impression here that we're really kicking the wrong dog," Towry said. "The problem here is with the federal government and the state.

"If we allow the local district to pencil-whip our permits and make us think we're in compliance ... well, the state or the federal (Environmental Protection Agency) comes in, and they have the ability to shut us down.

"It's in our best interest to have a strong, local air district," he said.

Stocking alleged, after the meeting, that business people who spoke in defense of the district had gotten "special deals" on their fees after exerting political pressure.

Stocking, without naming names, had made the allegation that some businesses had gotten special treatment during his testimony.

He also publicly accused the district of "Gestapo tactics:" alleged threats against a business that had spoken up publicly against the fee increases. Stocking later identified the supposed victim business as the Spreckels Sugar Co. of Woodland.

"Stop the Gestapo tactics," Stocking demanded. "This is not a place to exert political clout and stop a person from expressing his concerns."

Air Pollution Control Officer Selover, in his own defense, pointed to a letter from Spreckels Sugar to the distrct.

The letter complimented the air district staff, saying that it had been "very cooperative" in adjusting the district's current fees to reflect current emissions. It also said that a Spreckels official who had criticized the district at a meeting in January "may have created a misunderstanding of Spreckels' position in this matter."

Selover has also expressed a willingness to work with any business to develop a reasonable schedule for payment of fees or to help businesses find cheaper "offsets" to release them from part of their fee responsibility.

An offset is payment for something that will reduce emissions within the district, in lieu of part of a business's fee.

Stocking himself has been approached, Selover said, about the possible expansion of the B.C. Stocking Co.'s compressed natural gas fueling stations, to the possible benefit of both the company and the district's air quality.

"If that's his 'Gestapo tactics,' I apologize," Selover said.

"We've demonstrated time and time again our willingness to work with permit holders," he said.

The county supervisors reprimanded Stocking, saying that if he had accusations to make, he should have made them privately to his elected representatives or to Selover.

Keeping such accusations to himself until a crowded public meeting only served to "inflame a group of people," Solano County Supervisor William Carroll said.

Stocking and his association was appealing to new Yolo County Supervisors Frank Sieferman and Mike McGowan and new Solano County Supervisors Skip Thomson, Ed Schlenker and Barbara Kondylis.

The five new air district directors were not on the board last year when it decided to increase the district's budget by $600,000,

Businesses suspicious in wake of air fee increase

By ADAM STEINHAUER
Democrat Staff Writer

Leer West, a manufacturer of camper shells with a plant here in Woodland, thought they would have to be leaving town to stay in business. Now they are getting ready to expand their operation.

But Spreckels Sugar, whose processing plant outside of Woodland is a major local employer, is struggling with, among other things, a 1,000 percent increase in the fee it pays to the Yolo-Solano Air Pollution Control District.

Leer West and Spreckels are two local businesses that have struggled with new clean air requirements and with the controversial fee hikes imposed on industry last year by the Yolo-Solano Air Pollution Control District.

Leer West's story ended happily. Spreckels' is not yet resolved.

"We're going to make it because we're a survivor and because we're peared to the bone. But it's not easy," said Larry Bailey, manager of safety and environment for Spreckels' Woodland plant, in testimony Wednesday before the Yolo-Solano Air Pollution Control District Board of Directors.

The 1,000 percent jump in Spreckels' annual fees to the district has them paying about $35,000 a year.

That is a big bite out of the company's profits, according to Bailey, at a time when the sugar industry is unusually sluggish.

The recession allows Spreckels only several hundred thousand

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Daily Democrat 1/17/93

The Davis Enterprise

Tuesday, February 9, 1993 Vol. 97, No. 33 Davis, California 35cents

Businesses protest skyrocketing air quality fees

◆ Owners hope supervisors will reduce charges, or at least hear their pleas, at meeting

By RICHARD WARCHOL
Enterprise staff writer

Business owners and local industry officials, disgruntled over this year's whopping air pollution permit fee hikes, will meet Wednesday with members of the local air board at Davis City Hall.

The Yolo/Solano Air Pollution Control Board, composed of county supervisors from both counties, will meet at City Hall, 23 Russell Blvd., at 2 p.m.

Businesses hope to have the fees reduced, or at least open lines of communication with the air board.

Fees have skyrocketed anywhere from 200 to 2,000 percent for many businesses whose operations pollute the air.

The amount, many say, is too much in this recessionary climate. Industry and business, they say, carry the heaviest financial burden to reduce harmful air emissions while most of the problem stems from an ever-increasing dependence on the automobile.

"We have done a lot of investigating with regard to the fee structure," said Vicki Azevedo of Dixon, co-owner of Azevedo Hay and Grain. "I think it's going to make (the air board) stop and think. I think our main concern is to show the strength of the concerns that we really do have.

"Yes, there have to be changes involved with air pollution," she continued, "there have to be increases in our fees. But not at these levels."

Azevedo's permit costs to load, unload and dry grain products, for example, jumped about $1,300 in one year, the result of an increase in the neighborhood of 500 percent.

The fee hikes are the result of an ai district plan to boost revenue by mor than $600,000 in order to comply with stif federal and state Clean Air Act man dates. The revenue boost includes a $: hike in automobile registration fees.

The air district's $1.5 million budget approved in October, designates the added funds to increase employee salaries and benefits, and hire five new employees in order to draw up local compliance rules for residents, businesses, in-

See POLLUTION, Page A-2

- over -

OPINION

REPORTER
Richard Rico, Editor and Publisher
Steve Huddleston, Assistant Publisher and Editorial Page Editor
John Rico, President, John Rico Publishing Co.

Editorial

Fee hiked too much and too fast

Regulators of air pollution could have been a little more understanding of the plight of small businesses when it came time to adjust permit fees.

Times are tough for the regulatory agency that is responsible for the air quality of northeastern Solano County, including Dixon and Vacaville.

Pollution exceeds state standards and budget constraints make it difficult to maintain its staff and mission. And now, there is a backlash from farmers and business people who are being squeezed by huge increases in the fees they pay for an operating permit.

Yolo-Solano Air Pollution Control District directors, amid a business-threatening recession, chose to raise fees as much as 1,000 percent. Some large businesses can handle the increases, but most cannot, especially the majority of the 480 that are affected. Most are small businesses already struggling with government regulations to protect the environment.

It is hard to argue with air quality officials who cite a need for higher fees. They have been raised only marginally since 1978. The revenue generated by fees covers only 14 percent of the cost of sending out inspectors and issuing permits. Higher fees will generate $400,000 annually, and that is still only 80 percent of the cost of providing the service.

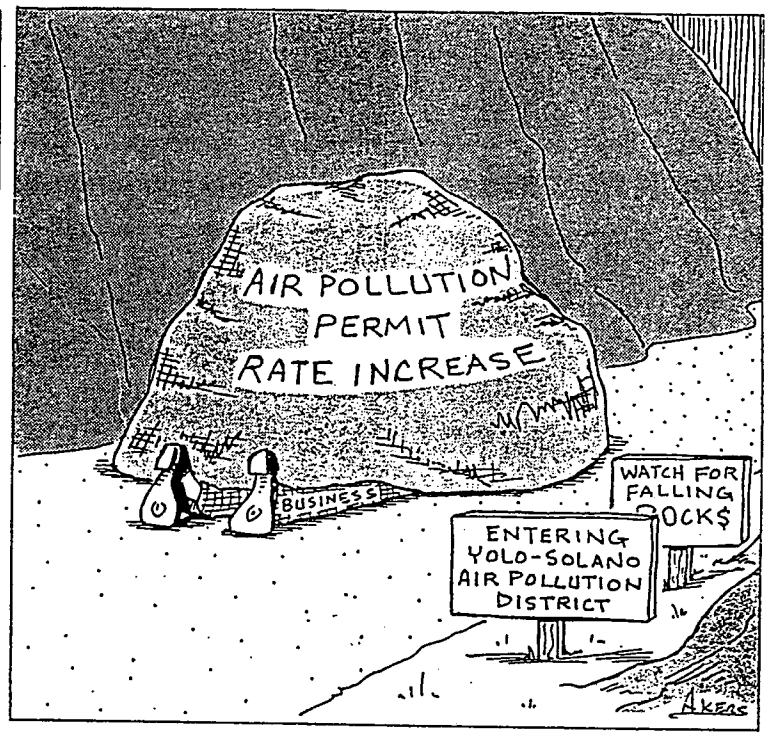
Those required to have permits emit pollutants that cause 40 percent of the problem of the greater Sacramento area's air pollution. The rest comes from automobiles. Car owners, through registration fees, contribute $1.4 million to the pollution agency's budget.

The area has the 10th-worst air quality in the nation and new industries which emit pollutants cannot come to this area until a comparable level of emissions are eliminated locally.

So is the fee hike a compulsory move? No. Directors were wrong in not phasing in rate hikes. Increases are justified, just not all at once.

A Dixon rancher saw her fees jump from $621 to $1,925. Farming is not a lucrative business these days. Add to new fees the new regulations on pesticides and other necessary protections the state is adding annually to businesses.

We have to protect the air, land and water. But we have to protect businesses that provide jobs to families.



Where's the superpower?

By TERRENCE PETTY

Leaders of the European Community quibbled for two days in Edinburgh, Scotland, often over matters that concern only their private club of nations.

And their dreams of a European superpower are still somewhere in the far-off distance.

British Prime Minister John Major said the EC gathering in Edinburgh that ended Saturday night would be "remembered as the summit which put the European Community back together."

Another point of view

But the 12 leaders may be no further ahead in their plan to become a cohesive force, let alone in joining the United States in global leadership.

The EC leaders hoped the Edinburgh summit would rescue the Maastricht Treaty on political and economic union, which had become nearly moribund because of its rejection by a Danish referendum, intense opposition in Britain, and a growing attitude in recession-rocked Europe that domestic problems are more important.

The summit may have accomplished its goal. But the fix could only be temporary.

The EC summit granted special concessions to Denmark to keep that country on board the unity train.

But there are no assurances the Danes won't reject the treaty a second time, since the concessions don't go much beyond "opt-outs" that are already included in the accord, negotiated last year in the Dutch city of Maastricht.

If Danes again reject the treaty it could also be torpedoed by the British, who won't do anything about ratifying the treaty until its fate in Denmark is determined.

Lord Tebbit, a fierce opponent of European unity, said he didn't think the Edinburgh summit altered the situation in Britain much at all.

"It remains the case that the people of Britain are overwhelmingly opposed to the Maastricht Treaty," said Tebbitt, a strong supporter of former Prime Minister Margaret Thatcher.

All 12 nations have to ratify the treaty before it can take effect. Some observers said that giving concessions to the Danes could set a dangerous that want to join the EC, said the German newspaper Die Welt.

The result then might not be a unified Europe, but one whose members are operating at cross-purposes.

"The summit paved the way for compromises in almost all problems" dealing with the Danes, said the West Allgemeine Zeitung newspaper. "But the outcome .. splits the Community into different classes."

The summit also showed how difficult it is for the EC countries to overlook their own national interests for the sake of unity.

The meeting was nearly derailed by a funding dispute, by an argument over how many seats each of the 12 nations should have in the European Parliament, and whether that body should be moved from Strasbourg to Brussels.

They finally reached compromises on funding and on reapportionment of the Parliament, and decided to leave that body where it is.

German Chancellor Helmut Kohl hailed the summit as a big success, but he was still left shaking his head over the time wasted on the Parliament siting issue.

"That was a very long debate, too long in my view," Kohl said.

The summit also showed the Community's inability to undertake action in world crises.

Though some of the 12 nations are individually taking part in the U.S.-led humanitarian action in Somalia, as a unit they could only issue a statement saying they "fully support" a U.N. resolution that authorizes all U.N. member states to participate in the relief operations.

It was the Germans, a prime mover in the push for creating a European superpower, who again voiced despair.

"It is true that (past EC) declarations were able to provide only marginal practical help" in former Yugoslavia, said German Foreign Minister Klaus Kinkel.

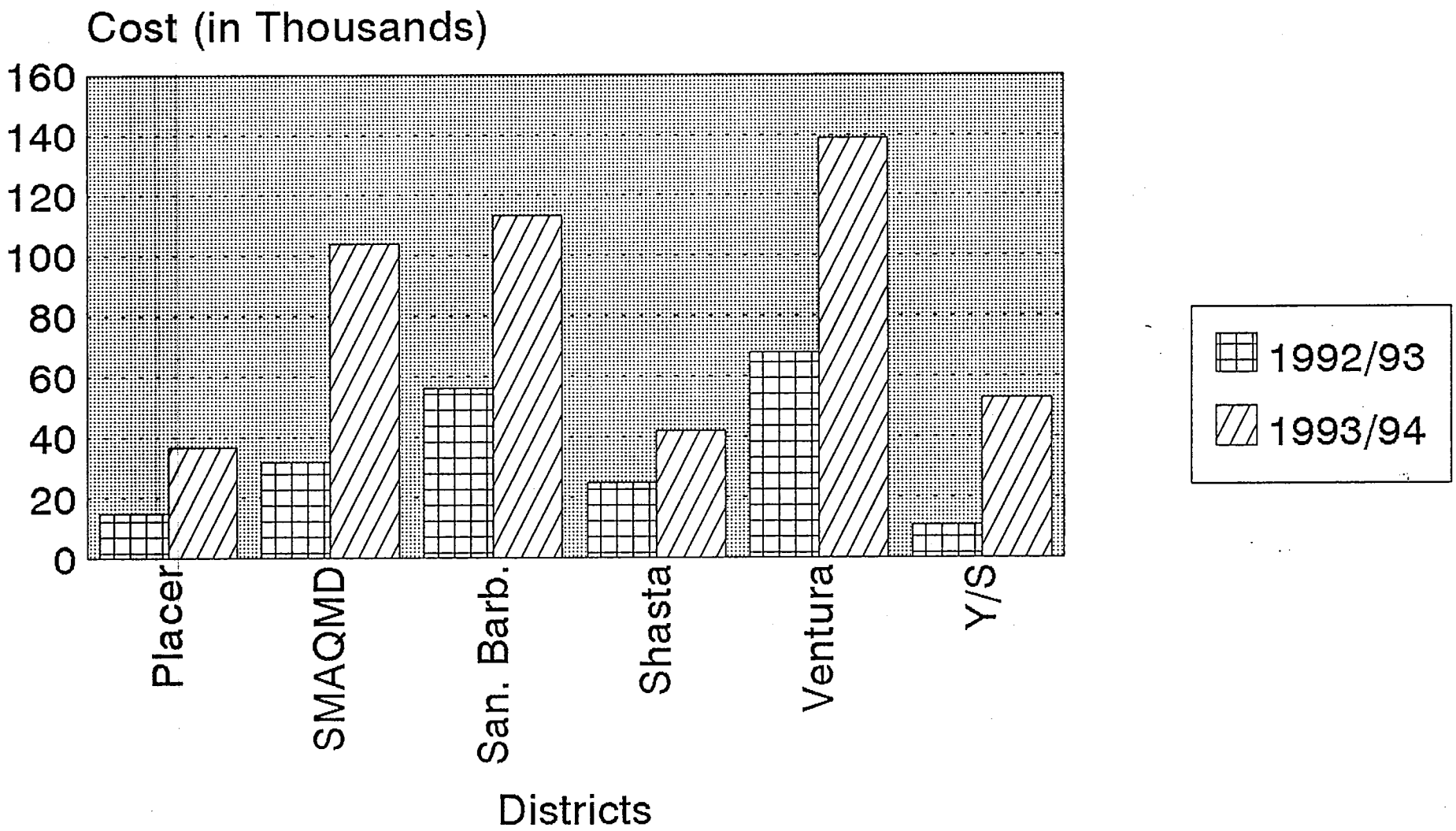
The leaders also didn't resolve allegations that U.N.-embargoed goods were making it to Serbia — considered the aggressor in the Bosnian war — through EC member Greece.

Nor did the leaders resolve Greece's ticklish disputes with Macedonia.

Macedonia declared its independence earlier this year but has received recognition from only a handful of countries. Greece vehemently opposes granting international recognition to Macedonia under that name, which already is used by a Greek province.

SHARE OF STATE COSTS

AB 2588



DISTRICT FEES

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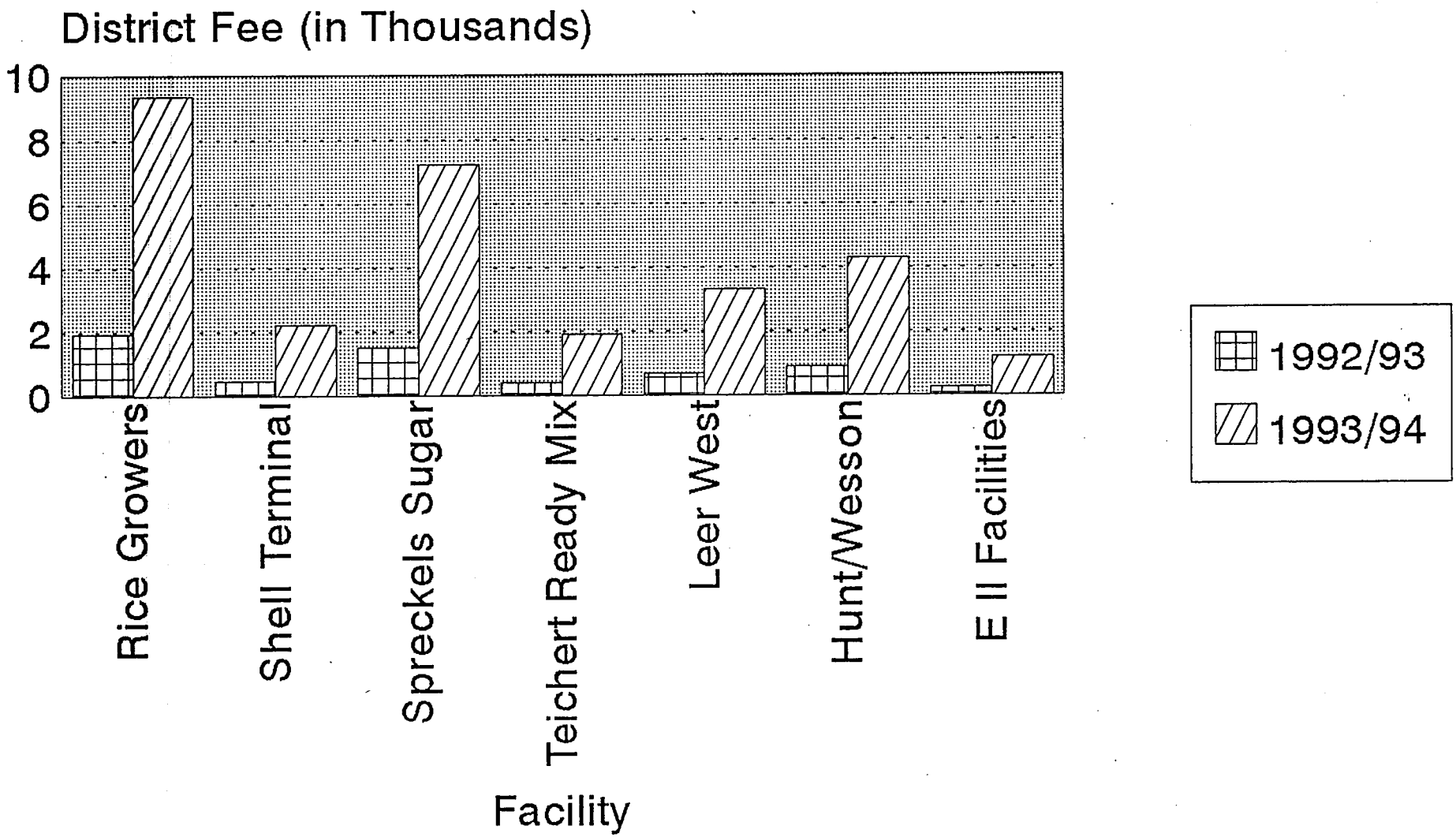

July 8, 1993

William Sandman
Colusa Co.
APCD
(2)

Comments on Proposed Amendments to the "Hot Spots" Fee Regulation for Fiscal Year 1993-94

Thank you for allowing me to comment on the proposed amendments to the Hot Spots Fee Regulation for 1993-94. My name is William Sandman and I am with the Colusa County Air Pollution Control District. I am representing Harry Krug, who is the Air Pollution Control Officer for Colusa County. My comments relate to the concerns of my district and other rural districts through-out the state.

The Air Toxics Hot Spots Information and Assessment Act of 1987 has been an information gathering process covering the emissions of toxic materials into the air. Sources were to submit a plan and a report on how and what emissions entered the air. Once the report was submitted, the report was to be updated on a biennial basis. Common sense would suggest that fees for operating a maintenance program should go down. We were told this by the ARB and relayed this information to our facilities.

In 1992, legislation passed requiring Risk Assessments for certain specified facilities. Of the thirty nine facilities in Colusa County with over 10 tons of emissions, there is not a single facility which will fall under the additional Health Risk Assessment Requirements of the Hot Spots Act. In table 4 on page 45 of the proposed amendments, the Colusa County District costs are reduced from $27,200 in fiscal year 92/93 to $13,750 for 93/94. This is a 49.5 percent reduction in program costs because the district is in a program maintenance phase of this act. If you look at table 1 on the page marked roman numeral 1-12, you

can see that the ARB fee for this program has increased 41.6 percent for Colusa County up from 13,697 in fiscal year 92/93 to $23,441 in 93/94.

In this day and age of tight economic times, it is not the time to spread the cost on everyone. The added costs of the Health Risks Assessments must be born by the affected industries. If the cost of this program is too burdensome on the affected industries, then a legislative change is needed.

The proposed amendments to the fee regulation are clearly a case of trying to spread a non-cost effective program over a larger base of non-participatory businesses to make the program costs more bearable. The Colusa County Air Pollution Control District does not agree with this practice and feels it is unfair to the many businesses through-out the state who have very limited toxic emissions.

The District strongly urges the Board to modify the proposed amendment to direct added costs to the specific portion of the program that is incurring those costs. Lets not try and hide these excessive costs by spreading them out on the other business who are not under the legal requirements for the added health risk information. Finally, it makes the district and the ARB look bad when we anticipate the reduced cost of a program and have it end up significantly increasing.

Thank you for your attention

CAUFIELD
ENTERPRISES

(8)

Members of the Air Resources Board 7/7/93

For the record, My name is Jack Caufield. My appearance today is sponsored by several small oil producers whose fees will increase as much as a factor of ten (10) or more times by the proposed fee regulation. We believe there are many other small producers in the same position. These small producers have no ability to raise prices so they can not offset these increased costs. In fact, oil prices have fallen drastically in the last few weeks. Following is a summary of my comments:

> Fee increases completely unreasonable
Depending on interpretation of the proposed rule, these small producers will have a fee increase anywhere from last years $400 to $4144, last years $800 to $8288 or more depending on lease location and number of leases. Some have natural gas production, light oil production and heavy oil production. Since these are separate sources under your new definition of stationary source, they could be subject to as much as 4 or 6 times $4144. There is no justification in the staff report for these huge increases on these small businesses. It is also not clear when fees are applied to small businesses. Are they applied per stationary source? per business? per location?

> Use of SCC Codes inappropriate
We do not believe your proposal to use SCC Codes meets the Legislative intent to base the fees on toxic emissions. The small producers I represent did not have to do a risk assessment and have low emissions of air toxics. The SCC Code does not represent toxic emissions or even a fair representation of work load. These small producers operate simple sources by a normal definition as shown in attachment A. They handle one natural material, crude oil. Because they have a slight difference in basic equipment or did a better job of AB 2588 reporting, they will have drastically higher fees than their neighbor.

> Socioeconomic analysis inadequate
Your staff has not done an adequate socioeconomic impact analysis as required by state law as follows:

- Businesses in California carry a much higher cost burden then comparable businesses in other states contrary to the staff report.
- Small oil producers in California are especially impacted since much of the crude oil is lower price heavy crude oil. Its price is also artificially low due to oil imported from Alaska into California depressing market prices.
- Many small producers and other small businesses are also not taxed at the corporate rate, so the tax comparison used by staff is also not correct.

1904 KATHRYN COURT • BAKERSFIELD, CA 93312 Phone/Fax (805) 589-0483

ATTACHMENT A

A typical oil production lease has the follow equipment which may produce emissions:

Equipment	SCC Code (6 digit)
Oil well	3-10-001-
Tanks	4-04-003-
Loading	4-06-001-
Water heater	3-10-004-
Flare	3-10-002-
Treatment chemicals	3-01-070-; 4-07-999-
well pump engine	2-03-002-

Depending on how fugitive emissions are reported, the source may also have used gas valve (3-10-002-) and/or flange (3-10-888-). Several other SCC Codes may be used also. These are simple process operations, producing a single product.