

TITLE 17. CALIFORNIA AIR RESOURCES BOARD

NOTICE OF PUBLIC HEARING TO CONSIDER THE PROPOSED REGULATION FOR THE REPORTING OF CRITERIA AIR POLLUTANTS AND TOXIC AIR CONTAMINANTS

The California Air Resources Board (CARB or Board) will conduct a public hearing at the time and place noted below to consider approving for adoption the proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (title 17, California Code of Regulations, section 93400 et seq.), which was developed pursuant to requirements of California Assembly Bill (AB) 617.¹

DATE: December 13, 2018

TIME: 9:00 a.m.

PLACE: California Environmental Protection Agency
California Air Resources Board
Byron Sher Auditorium
1001 I Street
Sacramento, California 95814

This item may be considered at a two-day meeting of the Board, which will commence at 9:00 a.m., December 13, 2018, and may continue at 8:30 a.m., December 14, 2018. Please consult the agenda for the meeting, which will be available at least 10 days before December 13, 2018, to determine the day on which this item will be considered.

WRITTEN COMMENT PERIOD AND SUBMITTAL OF COMMENTS

Interested members of the public may present comments orally or in writing at the hearing and may provide comments by postal mail or by electronic submittal before the hearing. The public comment period for this regulatory action will begin on October 26, 2018. Written comments not physically submitted at the hearing must be submitted on or after October 26, 2018, and received **no later than 5:00 p.m. on** December 10, 2018. CARB requests that when possible, written and email statements be filed at least 10 days before the hearing to give CARB staff and Board members additional time to consider each comment. The Board also encourages members of the public to bring to the attention of staff in advance of the hearing any suggestions for modification of the proposed regulatory action. Comments submitted in advance of the hearing must be addressed to one of the following:

¹ Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.

Postal mail: Clerk of the Board, California Air Resources Board
1001 I Street, Sacramento, California 95814

Electronic submittal: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Please note that under the California Public Records Act (Gov. Code, § 6250 et seq.), your written and oral comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) become part of the public record and can be released to the public upon request.

Additionally, the Board requests but does not require that persons who submit written comments to the Board reference the title of the proposal in their comments to facilitate review.

AUTHORITY AND REFERENCE

This regulatory action is proposed under the authority granted in California Health and Safety Code, sections 39600, 39601, 39605, 39607, 39607.1, 39701, 41511, 42700, 42705, 42705.5, 42705.6, and 44391.2. This action is proposed to interpret and implement section 39607.1 of the Health and Safety Code.

INFORMATIVE DIGEST OF PROPOSED ACTION AND POLICY STATEMENT OVERVIEW

Sections Affected: Proposed adoption to California Code of Regulations, title 17, Subchapter 7.7, Article 1, sections 93400, 93401, 93402, 93403, 93404, 93405, 93406, 93407, 93408, 93409, 93410, and 93411.

Documents Incorporated by Reference (Cal. Code Regs., tit. 1, § 20, subd. (c)(3)):

- California Office of Environmental Health Hazard Assessment (OEHHA), *Air Toxics Hot Spots Program – Risk Assessment Guidelines – The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. February 2015; Incorporated by reference in section 93401(c)(2)(A)1. Available at: <https://oehha.ca.gov/air/cnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>
- CARB, *Emission Inventory Criteria and Guidelines for the Air Toxics “Hot Spots” Program*. Effective September 26, 2007; Incorporated by reference in section 93402, “Toxic air contaminant.” Available at: <https://www.arb.ca.gov/ab2588/2588guid.htm> (Appendix A-1)
- United States Census Bureau, *North American Industry Classification System Manual*. 2017; Incorporated by reference in section 93402, “North American Industry Classification System (NAICS) code(s).” Available at https://www.census.gov/eos/www/naics/2017NAICS/2017_NAICS_Manual.pdf
- United States Environmental Protection Agency (U.S. EPA) Data Element Registry Service (DERS), Unit Type Code, *System of Registries – Export*, effective date January 7, 2013; Incorporated by reference in section 93402,

“Unit Type Code.” Available at:

https://iaspub.epa.gov/sor_internet/registry/datareg/searchandretrieve/valuelist/search.do?d-49489-e=5&verNr=1&details=displayDetails&id=12300&6578706f7274=1

- U.S. EPA Source Classification Codes, as Appendix C to the ISOR, accessed October 1, 2018; Incorporated by reference in section 93402, “Source Classification Code(s).” Available at: <https://ofmpub.epa.gov/sccwebservices/sccsearch/>
- National Oceanic and Atmospheric Administration, *North American Datum of 1983*. December 1989; Incorporated by reference in section 93402, “Geospatial coordinates.” Available at https://www.ngs.noaa.gov/PUBS_LIB/NADof1983.pdf

Background:

California’s existing air quality programs are responsible for significant public health improvements through statewide and regional air quality planning requirements, advancement of technology-based solutions, and risk reduction efforts near industrial facilities. For example, since the 1970s, regulations at the State and local level have led to a nearly 70 percent reduction in nitrogen oxide emissions, a key component of smog formation. Also, in the past 25 years, emissions and health impacts from air toxics exposure have been reduced by 75 percent.

However, certain communities continue to experience adverse and inequitable environmental and health impacts from air pollution. As compared to other areas, communities near ports, rail yards, warehouses, or freeways, for example, experience a higher concentration of air pollution due to emissions from mobile sources such as cars, diesel trucks, locomotives, and ships. Many of the same communities also experience air quality impacts from large industrial facilities such as oil refineries. Additionally, in many communities across the State, smaller sources of toxic air contaminants like chrome plating facilities, metal recycling facilities, oil and gas production operations, and pesticide use, also contribute to localized air quality impacts. Within certain communities, multiple sources of toxic air contaminants that are located in close proximity may also result in an elevated cumulative exposure burden for nearby human receptors.

AB 617, signed into law in July 2017, continues California’s environmental leadership by establishing innovative new practices to improve air quality in California’s most disadvantaged communities. AB 617 requires community-focused and community-driven action, using multiple strategies and tools, to reduce air pollution and improve public health in communities experiencing a disproportionate cumulative exposure burden from air pollutants. A critical component of AB 617 is its reporting requirements that will be implemented by this proposed regulation.

Emissions inventory data is the foundation of many programs at CARB. Emissions inventory data for greenhouse gases (GHG) support CARB’s programs focused on climate change issues, while inventory of criteria pollutant and toxic air contaminants

emissions data is critical to support California's air quality programs. Consistently updated and accurate emissions data is also fundamental to the community right-to-know tenets established in AB 197,² and the community-driven action mandated by AB 617. Emissions data is crucial to evaluating and mitigating the effects of air pollutants at the local, regional, and statewide levels.

Historically, emissions inventories were developed to assess emissions to support air quality programs such as State Implementation Plans and local measures implemented by the air districts. AB 197 and AB 617 require a more integrated, trend-based assessment of criteria pollutant and air toxics emissions data. However, the frequency and scope of reporting criteria pollutants and air toxics emissions varies between air districts. Many large air districts collect criteria and air toxic emissions data annually, while smaller districts may only report emissions once every three or four years, depending on the size of a facility. Additionally, the types of criteria pollutants and air toxics reported vary across districts, depending on the attainment status of air districts and the proximity of sources to large sources.

Proposed Regulatory Action:

The emission reporting requirements in AB 617 direct CARB to establish a uniform statewide system of annual reporting of criteria pollutant and toxic air contaminants for stationary sources, while working closely with the local air districts.

The proposed "Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants" (or CTR Regulation) includes the following:

- Annual criteria pollutant and air toxics emissions reporting for sources subject to the CTR Regulation;
- Consistency in the types of criteria pollutants and air toxics that need to be reported;
- Establishing applicability for sources subject to the reporting requirements;
- Establishing the contents and how the emissions must be reported in the emissions data report;
- Creating reporting deadlines and the process for submitting emissions data reports.

CARB will implement the proposed program requirements in tandem with local air districts to avoid potential duplication of reporting efforts. Air districts have worked closely with their local facilities for many decades and have detailed, specific knowledge of these facilities with regard to their permitting, data collection, and enforcement histories. The districts' knowledge is necessary to ensure the success of the statewide reporting program.

² Assembly Bill 197, Garcia, E., Chapter 250, Statutes of 2016, modified the California Health and Safety Code, amending § 39510 and § 39607, and adding § 38506, § 38531, § 38562.5, and § 38562.7.

This notice provides the objectives and benefits, a summary of fiscal impacts, and other information related to the implementation of AB 617's section 39607.1 of the California Health and Safety Code (H&SC) by establishing a uniform statewide system for mandatory annual emissions reporting to CARB.

Objectives and Benefits of the Proposed Regulation:

The proposed CTR regulation supports the community right-to-know components of AB 197 and the community-driven actions to address cumulative exposure burden in the most impacted communities in AB 617. The data collected under the regulation will be a significant and beneficial tool in ensuring that communities that are disproportionately affected by air pollution will get the help they need to reduce their air pollution burdens. Additionally, the CTR regulation meets the needs of AB 197 by requiring the annual collection of criteria pollutant and air toxics emissions data, which improves the ability to establish emissions trends for the largest of California's emissions sources.

A key benefit of the proposed regulation is its harmonization of statewide data submission requirements, such as reporting deadlines, frequency of reporting, and the specific chemical substances and other data to be reported on an annual basis, so that similar industrial sectors will begin to have data comparability, regardless of where they are located within California. This improved data in turn provides benefits to community groups, the public, regulators, scientists, CARB, and others, who have growing needs to access complete, user-friendly, and high quality emissions data. The proposed regulation would significantly increase access to useful data in user-friendly forms, such as mapping (as provided in the current CARB Pollution Mapping Tool³), graphs, and detailed emissions data reports when needed.

In addition to addressing the requirements and goals of AB 197 and AB 617, inventory data helps to determine what is being emitted into the air, by whom, and where. Inventory data helps guide and provides the scientific basis for CARB's regulatory development process; identify and address areas of concern; and to track progress in emission reduction efforts, from stationary sources, area sources, and mobile sources. Consistently reported and accurate inventory data are an essential element in the development of cost effective solutions to reduce air pollution and protect human health. Moreover, inventory data supports CARB's overall obligation to work to improve California's air quality. Additionally, while the reporting regulation provides no direct benefits to worker safety, over time, indirect benefits to workers and residents within these communities may be realized as a function of actions taken to reduce emissions, based on the improved inventory.

Comparable Federal Regulations:

Various provisions of existing federal regulations require the reporting of criteria emissions and toxics air contaminants to U.S. EPA. The proposed CARB regulation

³ CARB Pollution Mapping Tool: https://www.arb.ca.gov/ei/tools/pollution_map/.

also requires reporting of criteria and toxic emissions, which does have some overlap with existing federal requirements. Overall, however, the requirements are not duplicative. The proposed CARB regulation is specifically designed to address the needs associated with evaluating air pollution impacts in disproportionately impacted communities. These needs cannot be met with data collected under existing federal regulations, which makes it necessary to implement the new CARB requirements.

In addition, the reporting requirements are mandated by AB 617, section 39601.7(b)(1) of the H&SC, which requires CARB to establish “a uniform statewide system of annual reporting of emissions of criteria pollutants and toxic air contaminants for a stationary source.” Further, the cost of differing reporting regulations is justified by the anticipated benefits to human health, public welfare, and the environment. Community monitoring and emission reduction programs will be implemented using the data collected under the regulation as a foundation to establish, evaluate, and quantify community air quality improvements. Additional information related to the justification for adoption of regulations different from federal regulations is provided in Section IX of the “Staff Report: Initial Statement of Reasons – Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants,” referred to as the Initial Statement of Reasons (ISOR).

An Evaluation of Inconsistency or Incompatibility with Existing State Regulations (Gov. Code, § 11346.5, subd. (a)(3)(D)):

During the process of developing the proposed regulatory action, CARB conducted a search of any similar regulations on this topic and concluded that these regulations are neither inconsistent nor incompatible with existing State regulations.

DISCLOSURE REGARDING THE PROPOSED REGULATION

Fiscal Impact/Local Mandate Determination Regarding the Proposed Action (Gov. Code, § 11346.5, subs. (a)(5)&(6)):

The determinations of the Board's Executive Officer concerning the costs or savings incurred by public agencies and private persons and businesses in reasonable compliance with the proposed regulatory action are presented below. A more detailed description and analysis is provided in Chapter VII of the ISOR for this regulatory item.

Local Mandate Determination and Cost to any Local Agency or School District Requiring Reimbursement under section 17500 et seq.: None. Because the regulatory requirements apply equally to all reporting categories and unique requirements are not imposed on local agencies, the Executive Officer has determined that the proposed regulatory action imposes no costs on local agencies that are required to be reimbursed by the State pursuant to part 7 (commencing with section 17500), division 4, title 2 of the Government Code, and does not impose a mandate on local agencies that is required to be reimbursed pursuant to Section 6 of Article XIII B of the California Constitution. The proposed regulatory action would not create costs to any school district reimbursable by the state pursuant to Part 7 (commencing with section 17500), division 4, title 2 of the Government Code.

Cost or Savings for State Agencies: Pursuant to Government Code sections 11346.5(a)(5) and 11346.5(a)(6), the Executive Officer has determined that the proposed regulatory action would result in a total marginal cost increase to approximately 260 state owned or operated facilities, with a total cost of approximately \$138,000 over four years. The costs result from minor additional emissions reporting requirements.

Other Non-Discretionary Costs or Savings on Local Agencies: The cost to 1,610 local agencies is estimated to be approximately \$5,000,000 over four years. The local agency cost estimate includes a four-year cost of approximately \$4,000,000 for 31 local air districts to implement provisions of the regulation, and a four-year cost of \$625,000 for 1,574 additional local agencies, such as water treatment plants, landfills, power plants, and others, who would be subject to the proposed reporting requirements for facilities.

Cost or Savings in Federal Funding to the State: None. Pursuant to Government Code sections 11346.5(a)(5) and 11346.5(a)(6), the Executive Officer has determined that the proposed regulatory action would not create costs or savings in federal funding to the State.

Housing Costs (Gov. Code, § 11346.5, subd. (a)(12)):

The Executive Officer has made the initial determination that the proposed regulatory action will not have a significant effect on housing costs.

Significant Statewide Adverse Economic Impact Directly Affecting Business, Including Ability to Compete (Gov. Code, §§ 11346.3, subd. (a), 11346.5, subd. (a)(7), 11346.5, subd. (a)(8)):

The Executive Officer has made an initial determination that the proposed regulatory action would not have a significant statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states, or on representative private persons.

Results of The Economic Impact Analysis/Assessment (Gov. Code, § 11346.5, subd. (a)(10)):

NON-MAJOR REGULATION: Statement of the Results of the Economic Impact Assessment

Effect on Jobs/Businesses:

The Executive Officer has determined that the proposed regulatory action would not produce a noticeable change in employment, business creation, elimination or expansion, consumer prices, or business competitiveness in California due the reporting requirements. However, if the proposed regulation is adopted, we are expecting a small additional increase in California employment for technical consultants who will assist facilities in meeting the regulatory requirements. These consultants will typically act as technical assistance providers to assist in compiling data, preparing and reviewing

emissions reports, and submitting required data. The employment increase to assist facilities is expected to be minimal, possibly 25-50 new jobs statewide. The percentage is low because most affected facilities are already subject to data collection and reporting programs, so they will be able to comply with the regulation requirements using existing staffing. We do not expect any new businesses to be created resulting from the regulation, because any needed consultants would most likely be hired from existing firms.

In addition to private business job creation, some local air districts may need to add staffing to handle the additional workload imposed by the regulation. Many districts will be able to absorb the additional workload with current staffing, but some may need to hire new staff. Based on discussions with the air districts and their anticipated staffing needs, we estimate that approximately 5-15 additional district staff positions may be needed statewide to implement the requirements of the regulation.

Benefits of the Proposed Regulation:

The objective of the proposed regulatory action is to implement consistent statewide annual reporting requirements for facility criteria and toxics emissions data. A primary benefit of the regulation is to obtain detailed emissions data for use in reducing air pollution impacts for people living and working within communities disproportionately affected by airborne emissions. A more complete discussion of benefits of the regulation is provided previously in the "Objectives and Benefits" section of this document, under the Informative Digest of Proposed Action and Policy Statement Overview Pursuant to Government Code section 11346.5(a)(3).

Business Report (Gov. Code, §§ 11346.5, subd. (a)(11); 11346.3, subd. (d)):

In accordance with Government Code sections 11346.5, subdivisions (a)(11) and 11346.3, subdivision (d), the Executive Officer finds the reporting requirements of the proposed regulatory action that apply to businesses are necessary for the health, safety, and welfare of the people of the State of California.

Cost Impacts on Representative Private Persons or Businesses (Gov. Code, § 11346.5, subd. (a)(9)):

In developing this regulatory proposal, CARB staff evaluated the potential economic impacts on representative private persons or businesses. The Executive Officer is not aware of any cost impacts that a representative private person would necessarily incur in reasonable compliance with the proposed action, and has made an initial determination that the proposed regulatory action would not have a significant statewide economic impact directly affecting representative private persons.

CARB staff performed an analysis of the facilities affected by the proposed reporting regulation and determined that 13,980 unique facilities will have fiscal impacts resulting from the reporting requirements in the proposed regulation over the first four years of implementation.

CARB staff estimates that the requirements will lead to an overall cost increase of approximately \$4,438,256 for affected reporting facilities over a four-year period. Many industrial sectors in the state are affected by the regulation including large facilities such as refineries and power plants, down to smaller facilities such as retail gasoline fueling stations and automotive paint shops. For this reason, facility-specific costs will vary widely based on the complexity of the facility, the pre-existing facility reporting requirements, the sophistication of existing data collection and management systems, and other factors, potentially ranging from \$154 to over \$77,000 for the first year of implementation. However, to provide a single value, on an average basis, a “typical” median reporting facility affected by the proposed revisions will have an estimated total cost increase of \$1,405 over a four-year period to comply with the regulation. Additional fiscal information is included in the Section VII of the ISOR.

Effect on Small Businesses

The Executive Officer has determined, pursuant to California Code of Regulations, title 1, section 4 that the proposed regulatory action would affect approximately 4,750 small businesses, with an average cost per facility to comply with the reporting requirements of approximately \$154 to \$1,527 per year, depending on the complexity of the facility and the currently established reporting requirements. The definition of “small businesses” is based on the description of “small business” as established in California Government Code Section 11346.3(b)(4)(B),⁴ which requires that the business is independently owned and operated, not dominant in its field of operation, and has fewer than 100 employees. The cost of this regulation will have a minor financial impact on individual small businesses to collect and report data needed to comply with the regulation. However, the regulation is not expected to have a significant material financial impact, because the required data and reporting will typically include information that is currently being collected (and often reported) by facility operators such as throughputs, fuel use, material use, or sales data.

Alternatives Statement (Gov. Code, § 11346.5, subd. (a)(13)):

Before taking final action on the proposed regulatory action, the Board must determine that no reasonable alternative considered by the Board or that has otherwise been identified and brought to the attention of the Board, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law. The proposed new regulation does not have a significant adverse fiscal or economic impact.

Staff considered several alternatives to the proposed regulation, including not establishing the regulation (taking no action), evaluation of several alternatives related to altering the reporting applicability criteria, the adoption of performance standards, and alternatives for small business applicability. The specific alternatives are described in

⁴ California Government Code, Section 11346.3, approved by Governor September 14, 2016.

Chapter VIII of the ISOR. These alternatives were evaluated, but dismissed as not being as effective or more effective than the proposed regulation in carrying out the purposes of the AB 617 reporting requirements.

ENVIRONMENTAL ANALYSIS

CARB, as the lead agency under the California Environmental Quality Act (CEQA), has reviewed the proposed regulatory action and concluded that it is exempt pursuant to CEQA Guidelines section 15061(b)(3), because it can be seen with certainty that there is no possibility that the proposed action may have a significant adverse impact on the environment. A brief explanation of the basis for reaching this conclusion is included in Chapter V of the ISOR.

SPECIAL ACCOMMODATION REQUEST

Consistent with California Government Code section 7296.2, special accommodation or language needs may be provided for any of the following:

- An interpreter to be available at the hearing;
- Documents made available in an alternate format or another language; and
- A disability-related reasonable accommodation.

To request these special accommodations or language needs, please contact the Clerk of the Board at (916) 322-5594 or by facsimile at (916) 322-3928 as soon as possible, but no later than 10 business days before the scheduled Board hearing.

TTY/TDD/Speech to Speech users may dial 711 for the California Relay Service.

Consecuente con la sección 7296.2 del Código de Gobierno de California, una acomodación especial o necesidades lingüísticas pueden ser suministradas para cualquiera de los siguientes:

- Un intérprete que esté disponible en la audiencia;
- Documentos disponibles en un formato alternativo u otro idioma; y
- Una acomodación razonable relacionados con una incapacidad.

Para solicitar estas comodidades especiales o necesidades de otro idioma, por favor llame a la oficina del Consejo al (916) 322-5594 o envíe un fax a (916) 322-3928 lo más pronto posible, pero no menos de 10 días de trabajo antes del día programado para la audiencia del Consejo. TTY/TDD/Personas que necesiten este servicio pueden marcar el 711 para el Servicio de Retransmisión de Mensajes de California.

AGENCY CONTACT PERSONS

Inquiries concerning the substance of the proposed regulatory action may be directed to the agency representative John Swanson, Manager, at (916) 323-3076, or (designated back-up contact) Patrick Gaffney, Staff Air Pollution Specialist, at (916) 322-7303, both in the Criteria Pollutant & Air Toxics Reporting Section.

AVAILABILITY OF DOCUMENTS

CARB staff has prepared a Staff Report: Initial Statement of Reasons (ISOR) for the proposed regulatory action, which includes a summary of the economic and environmental impacts of the proposal. The report is titled, "Staff Report: Initial Statement of Reasons – Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants."

Copies of the ISOR and the full text of the proposed regulatory language may be accessed on October 23, 2018, on CARB's website listed below, or may be obtained from the Public Information Office, Air Resources Board, 1001 I Street, Visitors and Environmental Services Center, First Floor, Sacramento, California, 95814, (916) 322-2990.

Further, the agency representative to whom non-substantive inquiries concerning the proposed administrative action may be directed is Chris Hopkins, Regulations Coordinator, (916) 445-9564. Board staff has compiled a record for this rulemaking action, which includes all the information upon which the proposal is based. This material is available for inspection upon request to the contact persons.

HEARING PROCEDURES

The public hearing will be conducted in accordance with the California Administrative Procedure Act, Government Code, title 2, division 3, part 1, chapter 3.5 (commencing with section 11340).

Following the public hearing, the Board may take action to approve for adoption the regulatory language as originally proposed, or with non-substantial or grammatical modifications. The Board may also approve for adoption the proposed regulatory language with other modifications if the text, as modified, is sufficiently related to the originally proposed text that the public was adequately placed on notice and that the regulatory language as modified could result from the proposed regulatory action. If this occurs, the full regulatory text, with the modifications clearly indicated, will be made available to the public, for written comment, at least 15-days before final adoption.

FINAL STATEMENT OF REASONS AVAILABILITY

Upon its completion, the Final Statement of Reasons (FSOR) will be available and copies may be requested from the agency contact persons in this notice, or may be accessed on CARB's website listed below.

INTERNET ACCESS

This notice, the ISOR and all subsequent regulatory documents, including the FSOR, when completed, are available on CARB's website for this rulemaking at <http://www.arb.ca.gov/regact/2018/ctr2018/ctr2018.htm>.

CALIFORNIA AIR RESOURCES BOARD



Richard W. Corey
Executive Officer

Date: October 9, 2018

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.arb.ca.gov.