



June 29, 2018

California Air Resources Board

Via email to Ctr-report@arb.ca.gov

Re: Comments on Proposed Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting

Dear CARB staff:

Environmental Health Coalition (EHC) is a 38-year-old nonprofit organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region.

We appreciate the opportunity to comment on the proposed regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting. We support the proposed regulation and believe that requirements for a statewide emissions inventory will fill data gaps and enhance public access to information on air emissions in our communities. We have the following comments on the proposed components of the new regulation.

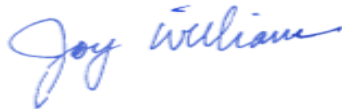
1. EHC strongly supports the proposal to require emissions reporting by device and process, as well as by the facility where the equipment that generates the emissions is located. This is a significant change from the way that greenhouse gas emissions are reported in California, and will be much more useful for assessing criteria and toxics air emissions at a community level. It will also be useful for identification and prioritization of opportunities to reduce emissions.
2. We agree also with the staff proposal to include additional information such as stack heights and locations, and specific facility location information. This additional information is necessary in order to conduct modeling of dispersion and potential health risks from emissions, modeling that for the most part has not been possible for members of the public to do.
3. We urge CARB to require reporting of potential emissions, as well as actual emissions. The potential to emit is a key metric for communities and air districts to assess the full range of emissions that have been permitted within a given area. The ability to readily compile information on potential emissions is important for understanding the full cumulative impact of all permitting decisions that have been made and that are proposed in a community. Linking this data to a mapping program would further enhance the capacity of residents and air districts to assess cumulative impacts at a neighborhood level.

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4. The proposed regulation should make explicit that the emissions inventory data will be accessible by the public. We recommend that the data be available on local air district websites as well as on a prominent site on the CARB website; that the data be searchable by, at a minimum, facility, substance, device or process, and year; and downloadable into a csv, Excel, or similar format that allows data to be used rather than simply viewed. The reporting year of data should be indicated. Latitude and longitude fields would also enhance the usefulness of the information.
5. We support the proposal to include facilities that currently report their GHG emissions, along with facilities that emit 250 tons or more per year of a nonattainment criteria pollutant or its precursors, those with an elevated Air Toxics Hot Spots prioritization score, and all permitted sources within selected communities. At the same time, we believe that at a future date, the reporting requirement must be expanded to all facilities that emit toxic air contaminants. The cumulative impact of emissions from many smaller facilities could be significant, and the emissions data will underestimate the cumulative burden of air toxic contamination of communities without this information.
6. Regarding the definition of “communities” within which emissions must be reported, we recommend that the community boundaries be drawn to include at least a half mile buffer, so that emissions from adjacent, upwind facilities will be captured in the inventories.
7. We recommend that the regulation include a mechanism for the public to petition CARB for a second opinion review of emission inventories that are believed to be inaccurate or incomplete.
8. We understand that development of harmonized reporting and integrated data management will take time, as will implementation of updated TAC lists, standardization of methods for calculation of Air Toxics Hot Spots prioritization scores, and development of quality assurance/quality control mechanisms. We urge CARB to move forward with all deliberate speed, and to include clear timelines in the regulation.

Thank you for the opportunity to comment on this proposed regulation.

Sincerely,



Joy Williams
Research Director