# Comment 1 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

# Comment 2 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Peggy Last Name: Shue

Email Address: pashue@aeraenergy.com

Affiliation:

Subject: Comments on Proposed Emissions Reporting Regulation

Comment:

Attached are comments on the proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants.

Attachment: 'www.arb.ca.gov/lists/com-attach/2-ctr2018-WjtXNFIhBzUGXwZj.pdf'

Original File Name: Aera Emissions Reporting Comments Dec 2018.pdf

Date and Time Comment Was Submitted: 2018-12-06 15:05:44

# Comment 3 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Edward Last Name: Kim

Email Address: edward.kim@ladwp.com

**Affiliation: LADWP** 

Subject: LADWP Comment Letter on Proposed CTR Regulation

Comment:

Please see attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/3-ctr2018-BmpWMVQxACQKfAlW.pdf'

Original File Name: LADWP Comment Letter on Proposed Regulation for the Reporting of Criteria Pollutants and Toxic Air Contaminants.pdf

Date and Time Comment Was Submitted: 2018-12-07 08:28:11

# Comment 4 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: David Last Name: Lusk

Email Address: dlusk@bcaqmd.org

Affiliation: Butte County Air Management District

Subject: Comments CTR2018

Comment:

See attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/4-ctr2018-VjVRI1AjVTRVY1Jj.pdf'

Original File Name: CTR2018 BCAQMD Comments.pdf

Date and Time Comment Was Submitted: 2018-12-07 13:45:32

# Comment 5 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Bill Last Name: La Marr

Email Address: billlamarr@msn.com

Affiliation: California Small Business Alliance

Subject: Comment Letter on CTR Reporting

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/5-ctr2018-UzAGc1IxVmQHL1U2.pdf'

Original File Name: csba.comment.ltr.2\_CTR-reporting-12102018\_0001.pdf

Date and Time Comment Was Submitted: 2018-12-10 13:18:30

# Comment 6 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Sarah Last Name: Aird

Email Address: sarah@pesticidereform.org

Affiliation:

Subject: CPR Comments re: Proposed Reg for Reporting of Criteria Air Pollutants & TACs

Comment:

Please see Californians for Pesticide Reform's attached comment letter on CARB's Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants.

Attachment: 'www.arb.ca.gov/lists/com-attach/6-ctr2018-UTcBblM8BTcKYFIN.pdf'

Original File Name: FINAL CPR Comment letter CARB Pesticide TAC emissions December 2018.pdf

Date and Time Comment Was Submitted: 2018-12-10 13:33:04

# Comment 7 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Colby Last Name: Morrow

Email Address: clmorrow@semprautilities.com

Affiliation: SoCalGas Company

Subject: SDG&E & SoCalGas comments on Proposed CTR Regulations

Comment:

Thank you for the opportunity to provide comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/7-ctr2018-VWRdaVV5B2UKPAEs.pdf'

Original File Name: 12-10-18 SEu CTR Final Comment letter.pdf

Date and Time Comment Was Submitted: 2018-12-10 14:57:05

# Comment 8 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Lawrence Last Name: Lingbloom

Email Address: lawrence.lingbloom@asm.ca.gov

Affiliation:

Subject: CTR Regulation

Comment:

Please consider the attached letter from Assemblymembers Cristina Garcia and Richard Bloom. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/8-ctr2018-AGFSJIIxWVVSN1Qg.pdf'

Original File Name: ARB CTR 121018.pdf

Date and Time Comment Was Submitted: 2018-12-10 14:58:04

# Comment 9 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Julia Last Name: May

Email Address: julia@cbecal.org

Affiliation: Communities for a Better Environment (CB

Subject: Criteria and TAC Reg - Refinery Emissions Underreported

Comment:

CBE Comments Criteria & TAC Reporting - even many standard oil refinery emissions estimation methods grossly underestimate - while standardization statewide is important - standards must also be accurate - see attachment.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-ctr2018-VTZTNwNnUI5QNQlm.pdf'

Original File Name: CBE Comment CARB AB617 Crit n Toxics Reporting 121018.pdf

Date and Time Comment Was Submitted: 2018-12-10 15:14:43

# Comment 10 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Noelle Last Name: Cremers

Email Address: ncremers@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: Criteria Pollutant and Air Toxics Reporting Regulations

Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/10-ctr2018-VjUAdFE5UXYKaQR2.pdf'

Original File Name: Criteria Pollutant and Air Toxics Reg Comments 12-10-18.pdf

Date and Time Comment Was Submitted: 2018-12-10 16:06:01

# Comment 11 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Janet Last Name: Whittick

Email Address: janetw@cceeb.org

Affiliation: CCEEB

Subject: CCEEB comments on Proposed Emissions Reporting Regulation

Comment:

Thank you for the opportunity to submit the attached comments on CARB's statewide emissions reporting regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/11-ctr2018-U2FUYgY2UDtXf1Rl.pdf'

Original File Name: 2018.12.10\_ReportingReg\_CCEEBfinal.pdf

Date and Time Comment Was Submitted: 2018-12-10 16:30:42

# Comment 12 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Jeff Last Name: Sickenger

Email Address: jsickenger@ka-pow.com

Affiliation:

Subject: CARB's proposed AB 617 criteria and air toxics emissions reporting regulation

Comment:

Please find the attached comments regarding CARB's proposed reporting requirements for AB 617 on behalf of Lockheed Martin.

Thank You, Jeff Sickenger

Attachment: 'www.arb.ca.gov/lists/com-attach/12-ctr2018-AW1UP1AyVVkHYARm.pdf'

Original File Name: LMC AB 617 Comments 100218 Final.pdf

Date and Time Comment Was Submitted: 2018-12-10 16:36:59

# Comment 13 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Christopher Last Name: Brown

Email Address: apco@fraqmd.org

Affiliation: FRAQMD

Subject: Regulation for the Reporting of Criteria and Toxic Air Contaminants

Comment:

Comments attached

Attachment: 'www.arb.ca.gov/lists/com-attach/13-ctr2018-VTZRI1QnUDEHMVJj.pdf'

Original File Name: CTR2018 FRAQMD Comments.pdf

Date and Time Comment Was Submitted: 2018-12-10 16:42:26

# Comment 14 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Fariya Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E 45-Day Comments on AB 617 CP & Toxics Reporting Regulation

Comment:

See attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/14-ctr2018-BWQGYl1qWTsLOglW.pdf'

Original File Name: AB617 Emissions Reporting 45-Day PGE\_12-10-18.pdf

Date and Time Comment Was Submitted: 2018-12-10 16:42:33

# Comment 15 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Laura Last Name: Rosenberger

Email Address: lauragreen.rosenberger@gmail.com

Affiliation:

Subject: Air toxin emission reporting

Comment:

The natural gas industry should not be exempt to the stricter air toxin reporting reporting. It would better not to give exemption to small projects. Lower the exemption mass of toxic gases. Also require reporting for the thousands of breakdown and oxidation products of HAPs.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-12-10 16:53:52

# Comment 16 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Christine Last Name: Zimmerman

Email Address: czimmerman@wspa.org

Affiliation: WSPA

Subject: AB 617 Emission Reporting WSPA Comments

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/16-ctr2018-AnUAdVAhADJReQJy.pdf'

Original File Name: wspa.pdf

Date and Time Comment Was Submitted: 2018-12-10 17:15:26

# Comment 17 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Amy Last Name: Kyle

Email Address: amydkyle@berkeley.edu

Affiliation:

Subject: Comments on CTR Rule

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/17-ctr2018-B2kFZAdpAn9VMFc4.pdf'

Original File Name: NGO.Comments.CTRRule.12.09.18.final.pdf

Date and Time Comment Was Submitted: 2018-12-11 08:03:23

# Comment 18 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Nicholas Last Name: Maiden

Email Address: Non-web submitted comment

Affiliation:

Subject: BAAQMD Comments Regarding Criteria and Toxic Air Contaminants

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/18-ctr2018-AWMFYlc3AiAEbwRg.pdf'

Original File Name: BAAQMD\_Comments\_CTR Regulation.pdf

Date and Time Comment Was Submitted: 2018-12-11 09:46:06

# Comment 19 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 45 Day.

First Name: Mark Last Name: Sedlacek

Email Address: Non-web submitted comment Affiliation: LA Department of Water & Power

Subject: LATE Proposed Regulation for CTR

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/19-ctr2018-UmEGXwFsADIEZgVy.pdf'

Original File Name: 3 LADWP Corrected.pdf

Date and Time Comment Was Submitted: 2018-12-18 13:18:39

There are no comments posted to Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) that were presented during the Board Hearing at this time.

#### Comment 1 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Rick Last Name: Aldinger

Email Address: rick@bigsurriverinn.com

Affiliation:

Subject: State Emission Reporting Regulation

Comment:

I have only recently become aware of the proposed reporting regulation and, if I understand the complicated language correctly, it looks like we would be required to comply with the additional requirement. That being the case, I would strongly urge the Board to incorporate this reporting into the existing online reports we already submit. We are a small retail gas station, and it is a challenge to comply with existing regulations without adding more. Please resist adding an additional process for us, when there is an existing platform that could be used for this new reporting requirement. Thank you.

Rick Aldinger
General Manager
Big Sur River Inn Valero

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-05-23 13:50:42

# Comment 2 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Michael Last Name: Tooley

Email Address: michael@tooleyoil.com

Affiliation: Tooley Oil

Subject: AB 617 Changes to Criteria and Toxics Reporting

Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/21-ctr2018-BjQHXlcwVXNSMQRo.pdf

Original File Name: 2 Fuels Tooley.pdf

Date and Time Comment Was Submitted: 2019-06-04 14:46:25

29 Duplicates.

#### Comment 3 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Lauren Last Name: Paladino

Email Address: lpaladino@lawa.org Affiliation: Los Angeles World Airports

Subject: Emissions Reporting 93404(b)(2)(C)

Comment:

It is recognized that the question regarding the emissions reporting of portable equipment registered under PERP has already been addressed (report this equipment if it is located at a facility greater than or equal to three months). Notwithstanding, I am offering concern that the current SCAQMD AER reporting tool, which will be used for the AB 617 data collection in the South Coast district, currently excludes reporting of "Portable equipment registered under the Statewide Portable Equipment Registration Program".

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-06-05 12:18:50

# Comment 4 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Sondra Last Name: Spaethe

Email Address: sspaethe@fraqmd.org

Affiliation: FRAQMD

Subject: CTR Regulation Comments

Comment:

Please see attached comment letter from the Air Pollution Control Officer.

Attachment: www.arb.ca.gov/lists/com-attach/52-ctr2018-BWYHdVIhA2IGMAY3.pdf

Original File Name: CTR2019 June 6 FRAQMD Comments.pdf

Date and Time Comment Was Submitted: 2019-06-06 09:03:30

# Comment 5 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Amy Last Name: Clymo

Email Address: aclymo@mbard.org

Affiliation: Monterey Bay Air Resources District

Subject: Comments on Modified Text for the CTR

Comment:

Please review attached comment letter.

Attachment: www.arb.ca.gov/lists/com-attach/53-ctr2018-UzUGaQdoBDZSOFc6.pdf

Original File Name: FinalMBARDComments25-daymodifications.pdf

Date and Time Comment Was Submitted: 2019-06-06 16:19:38

### Comment 6 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Noelle Last Name: Cremers

Email Address: ncremers@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: Criteria Pollutant and Air Toxics Reporting Regulations

Comment:

Attached are our comments on the Regulation for Criteria Air Pollutant and Toxic Air Contaminant Emissions Reporting.

Attachment: www.arb.ca.gov/lists/com-attach/54-ctr2018-WjlXJVMgBwsLbgBh.pdf

Original File Name: CTR CARB Comments 6-6-19.pdf

Date and Time Comment Was Submitted: 2019-06-06 16:54:17

# Comment 7 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Christina Last Name: DiCaro

Email Address: cdicaro@ka-pow.com

Affiliation: Granite Construction for Kyle Larkin

Subject: Opposition: Proposed Reg. for the Reporting of Criteria Air Pollutants & Toxic Air

Contam
Comment:

Dear Mr. Gaffney, Please find attached an official letter from Granite Construction regarding "Opposition to the Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants."

Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/55-ctr2018-WzhXMFQnAjMBWFcl.pdf

Original File Name: CARB Reporting Criteria 25-Day Comments EM.pdf

Date and Time Comment Was Submitted: 2019-06-06 17:12:56

# Comment 8 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Anetha Last Name: Lue

Email Address: anetha.lue@calenergy.com

Affiliation: CalEnergy

Subject: Comments to the May 13, 2019, Revision of the CTR Regulation

Comment:

Please see attached file for comments.

Attachment: www.arb.ca.gov/lists/com-attach/56-ctr2018-UDNXMFY7WG4HbwJn.pdf

Original File Name: CalEnergy, Air Toxic Reporting Regulations Comments, 06 06 17.pdf

Date and Time Comment Was Submitted: 2019-06-06 18:31:50

# Comment 9 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Bill Last Name: La Marr

Email Address: billlamarr@msn.com

Affiliation: California Small Business Alliance

Subject: Comment Letter Regarding the 25 Day Modifications to the CTR Regulation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/57-ctr2018-BmVQIIIhV1sCdgdi.pdf

Original File Name: ctr\_reg\_25-day\_Letter\_csba.carb-Jun.7.2019.pdf

Date and Time Comment Was Submitted: 2019-06-07 08:12:27

# Comment 10 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Rene Last Name: Toledo

Email Address: rene.toledo@smud.org

Affiliation: SMUD

Subject: Comments Regarding CTR Regulation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/58-ctr2018-VzQBc1wvBWQHMVdm.pdf

Original File Name: CTR2018 Comments\_SMUD\_2019-06-07.pdf

Date and Time Comment Was Submitted: 2019-06-07 08:13:27

# Comment 11 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Samuel Last Name: Bayless

Email Address: bayless@cfca.energy

Affiliation: California Fuels and Convenience Alliance

Subject: CFCA Comments CTR

Comment:

California Fuels and Convenience Alliance comments attached.

Attachment: www.arb.ca.gov/lists/com-attach/59-ctr2018-WjlVNVEzU2ELUgJh.pdf

Original File Name: CFCA Comments AB617 CTR Modifications 6.7.19.pdf

Date and Time Comment Was Submitted: 2019-06-07 08:11:10

# Comment 12 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Adam Last Name: Harper

Email Address: aharper@calcima.org

Affiliation: CalCIMA

Subject: AB 617 Emission Reporting Regulations Comments

Comment:

Attached please find the comments of the California Construction and Industrial materials Association and the California Asphalt Pavement Association.

Attachment: www.arb.ca.gov/lists/com-attach/60-ctr2018-AWBVMV0DUjcANwcw.pdf

Original File Name: Ab 617 Reporting Regulation Letter 25 day comments final.pdf

Date and Time Comment Was Submitted: 2019-06-07 08:37:28

# Comment 13 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Kathryn Last Name: Ostapuk

Email Address: kathryn.ostapuk@navy.mil

Affiliation: Department of Defense

Subject: DoD Comments on ARB 617 CTR 15-Day Revisions

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/62-ctr2018-VzNSOwFkUl4FYABv.pdf

Original File Name: DoD Comments.pdf

Date and Time Comment Was Submitted: 2019-06-07 10:19:03

### Comment 14 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Jack Last Name: Monger

Email Address: jack.monger@ieaca.org

Affiliation: Industrial Environmental Assn. (IEA)

Subject: Comments regarding CTR Regulation

Comment:

Please find attached our letter which includes our comments. Please feel free to contact me regarding any questions or difficulties with this transmission. Sincerely, Jack Monger CEO

Attachment: www.arb.ca.gov/lists/com-attach/63-ctr2018-VzQAaVY6VGoCYQRq.pdf

Original File Name: Comments for CTR Regulation Update June 7, 2019.pdf

Date and Time Comment Was Submitted: 2019-06-07 10:28:41

# Comment 15 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Chris Last Name: Zgraggen

Email Address: czgraggen@capitoladvocacy.com

Affiliation:

Subject: California Retailers Assn. Comments

Comment:

Submitting on behalf of the California Retailers Assn.

Attachment: www.arb.ca.gov/lists/com-attach/64-ctr2018-AmFUIFU1BAgGY1Q1.pdf

Original File Name: CRA CARB letter\_re\_criteria air pollutant reporting.pdf

Date and Time Comment Was Submitted: 2019-06-07 11:36:31

# Comment 16 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Cindy Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on CTR Reg (25-day changes)

Comment:

See attached comments.

Attachment: www.arb.ca.gov/lists/com-attach/65-ctr2018-AW0FYgRhWHwDdQRb.pdf

Original File Name: LADWP Comments-CTR25DayChanges-6.7.2019.pdf

Date and Time Comment Was Submitted: 2019-06-07 12:48:00

## Comment 17 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Leah Last Name: Silverthorn

Email Address: Leah.Silverthorn@calchamber.com Affiliation: California Chamber of Commerce

Subject: Comment Letter re CTR Regulation

Comment:

Attached is our comment letter re Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants. If you have any questions, please contact us. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/66-ctr2018-VTRWMgZYA2YCNVNk.pdf

Original File Name: AB 617 Community Monitoring Regulations-15 day notice comments.pdf

Date and Time Comment Was Submitted: 2019-06-07 12:36:13

## Comment 18 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Janet Last Name: Whittick

Email Address: janetw@cceeb.org

Affiliation: CCEEB

Subject: CCEEB Comments on CTR 25-day changes

Comment:

Please find attached comments from the California Council for Environmental and Economic Balance on the Proposed 25-Day Changes to the Criteria and Toxics Reporting Regulation. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/67-ctr2018-WmhcagExWTNSegMz.pdf

Original File Name: 2019.06.07 CCEEB CTR comments\_final.pdf

Date and Time Comment Was Submitted: 2019-06-07 14:16:21

## Comment 19 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Tiffany Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: Western States Petroleum Association

Subject: Western States Petroleum Association

Comment:

Attached please find Western States Petroleum Association's comment letter. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/68-ctr2018-UiUHcgFwBDYBWFQ1.pdf

Original File Name: WSPA AB 617 CTR 25-Day Changes Final .pdf

Date and Time Comment Was Submitted: 2019-06-07 14:33:28

## Comment 20 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Jerry Last Name: Desmond

Email Address: jerry@desmondlobbyfirm.com

Affiliation:

Subject: ctr2018. Comment:

Attached please find the comments of the Metal Finishing Association of Southern California [MFASC] and the Metal Finishing Association of Northern California [MFANC].

Best,

Jerry Desmond

Attachment: www.arb.ca.gov/lists/com-attach/69-ctr2018-AWxSMIULWGgDZANx.pdf

Original File Name: MF CARB AB 617 Reg Comments 6-7-19.pdf

Date and Time Comment Was Submitted: 2019-06-07 14:34:35

#### Comment 21 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Sarah Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CASA

Subject: CASA comments regarding the Draft CTR

Comment:

Hello,

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the proposed modifications to the draft regulation for the reporting of criteria air pollutants and toxic air contaminants under Assembly Bill 617 (AB 617). We further appreciate your willingness to consider our recommendations. Please contact me if you have any questions at (925) 705-6404 or sdeslauriers@carollo.com.

Regards, Sarah A. Deslauriers CASA Climate Change Program Manager

Attachment: www.arb.ca.gov/lists/com-attach/70-ctr2018-UTJUM10vVmQBWARl.pdf

Original File Name: CASA AB 617 FINAL Comment Letter\_25-DayComments\_060719.pdf

Date and Time Comment Was Submitted: 2019-06-07 14:38:32

## Comment 22 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Gary Last Name: Ma

Email Address: ma36@llnl.gov

Affiliation: Lawrence Livermore National Laboratory

Subject: LLNL Comments on Modified Text for the CTR Regulation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/72-ctr2018-WjldNANvVmgEZwFv.pdf

Original File Name: Comments on Board Item ctr2018\_ LLNL Comments on Modified Text for the CTR Regulation.pdf

Date and Time Comment Was Submitted: 2019-06-07 14:57:07

# Comment 23 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Adam Last Name: Guernsey

Email Address: aguernsey@hthjlaw.com

Affiliation: HTHJ

Subject: 25 Day Comments on Proposed Regulation for the Reporting of Criteria Air Pollutants

Comment:

Please see attached letter.

Attachment: www.arb.ca.gov/lists/com-attach/73-ctr2018-ADZTeFdhWScFMgA5.pdf

Original File Name: 6-7-19 25-day Comment Letter (00398815).pdf

Date and Time Comment Was Submitted: 2019-06-07 15:45:28

# Comment 24 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: John Last Name: Haley

Email Address: jehaley@aeraenergy.com

Affiliation: Aera Energy LLC

Subject: Comments on Amendments to CTR Regulation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/74-ctr2018-AGFUN1EiADIGX1Qx.pdf

Original File Name: Aera Emissions Reporting Comments Jun 2019.pdf

Date and Time Comment Was Submitted: 2019-06-07 16:05:22

# Comment 25 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Amy Last Name: Roberts

Email Address: aroberts@airquality.org

Affiliation: SMAQMD

Subject: SMAQMD Comments on CTR Regulation 25-day Changes

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/75-ctr2018-ViUHbAdnACIFblQw.pdf

Original File Name: SMAQMD Comments CTR Regulation 25-day Changes June 2019.pdf

Date and Time Comment Was Submitted: 2019-06-07 16:07:01

## Comment 26 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Colby Last Name: Morrow

Email Address: clmorrow@semprautilities.com

Affiliation: SoCalGas Company

Subject: SDG&E & SoCalGas comments on Revised CTR Regulations

Comment:

Thank you very much to staff working on CTR.

Attachment: www.arb.ca.gov/lists/com-attach/76-ctr2018-W2lQZlNjVz1SeQM1.pdf

Original File Name: 2019-6-7 SEu final comment letter-5.13.19 CTR revisions.pdf

Date and Time Comment Was Submitted: 2019-06-07 16:04:43

## Comment 27 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Fariya Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E Comments on AB 617 CTR Regulation

Comment:

See attached

Attachment: www.arb.ca.gov/lists/com-attach/77-ctr2018-VzZRNVFmAmBWZ1IN.pdf

Original File Name: AB617 Emissions Reporting 25-Day PGE\_6-7-19.pdf

Date and Time Comment Was Submitted: 2019-06-07 16:20:08

## Comment 28 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Ashlyn Last Name: Wenger

Email Address: awenger@graniterock.com

Affiliation: Granite Rock Company

Subject: Opposition AB 617 Criteria Pollutant and Toxic Emissions Reporting

Comment:

Please refer to attached AB617 Opposition Letter

Attachment: www.arb.ca.gov/lists/com-attach/78-ctr2018-AWAGYgE2BGYCM1MM.pdf

Original File Name: AB617 Opposition.pdf

Date and Time Comment Was Submitted: 2019-06-07 17:06:34

## Comment 29 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Jim Last Name: Swaney

Email Address: jim.swaney@sdcounty.ca.gov

Affiliation: San Diego County APCD

Subject: SDAPCD Comments on Modified Text for CTR Regulation

Comment:

Please find attached comments from the San Diego Air Pollution Control District on the Modified Text for the CTR Regulation.

Attachment: www.arb.ca.gov/lists/com-attach/79-ctr2018-AnEAYgdnUXICZwRg.pdf

Original File Name: SDAPCD Comments on Modified Text for CTR Regulation.pdf

Date and Time Comment Was Submitted: 2019-06-07 17:23:23

## Comment 30 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Comments from 21 Org Last Name: Posted by Amy Kyle Email Address: adkyle@berkeley.edu

Affiliation:

Subject: CTR Rule

Comment:

I am submitting these comments on behalf of 21 non-governmental organizations working on environmental justice, public health, and environmental protection.

Amy D Kyle

Attachment: www.arb.ca.gov/lists/com-attach/80-ctr2018-UjxSM1Y4VWUKYwFs.pdf

Original File Name: NGOComments.CTR.06.07.19r.pdf

Date and Time Comment Was Submitted: 2019-06-07 21:21:27

## Comment 31 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Allan Last Name: Maurey

Email Address: Allan.maurey@siemens.com

Affiliation:

**Subject: Comments** 

Comment:

Activity level - there is still no specific guidance on how to capture actual voc releases during coating.

Engineering estimates - because of the vagueness of this statement. Would like time for the regulatory community and the sources to clearly define these based on current technology and methodology Would help if there was a form associated with reporting already available for review.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-06-07 22:03:14

#### Comment 32 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: George Last Name: Osborne

Email Address: gosborne@duningercorp.com

Affiliation:

Subject: Changes in reporting

Comment:

Thank you for taking comments. I have worked closely with the Monterey Bay Air Resource Board helping clients come into and stay in compliance to operate both diesel and natural gas power generators. None of these clients want to operate generators and to do the work to comply and the high expense. I do not like the term victim, however in a sense the inability of PG&E to in any reasonable time frame supply power has forced them to spend money labor resources and hire people like me to navigate the paper work when they would prefer to write a check and have clean reaiable power.

What I believe needs to be considered when you consider more regulation, which you may have the right, however it may not be the right thing to do.

- 1. Jobs have already been lost because the cost to operate on generators is so high. Many of our clients grow cannabis which has seen a steady decline in the price of product as a result of supply and demand. Fees and taxes however are fixed.
- 2. Publishing this data adds to a very high security risk for these business as they operate on cash, not because of choice, but federal banking laws. When the state publishes these locations it is an open invitation for these business to have greater security issues both for product theft and the cash needed to operate.
- I sincerely believe that no ill will is involved, however unintended consequences are added cost to business that provide many agricultural jobs and related services will cut back as margins are already tight. The added risk of inviting crime to a pinpoint location with the potential for property loss, injury or death seems unnecessary, when the goal is to be on the grid, once the utility can add resources.

Thank you for reading, for understanding this is not a situation that anybody forsaw and all are working hard to resolve.

Best regards,

George Osborne 2-6 484 8538

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-06-07 22:25:19

#### Comment 33 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Amy Last Name: Kyle

Email Address: adkyle@berkeley.edu

Affiliation:

Subject: Technical Comments and Questions on the "Thresholds"

Comment:

Table A-3 shows sectors and compounds that CARB proposes to include in the inventory of sources and emissions. The approach is quite different from what was discussed at the Board hearing, as sectors and compounds not listed fall out of the rule.

It is difficult to assess the impact of this table because the analysis that led to it has not been provided. It is not easy to discern what will fall out of the inventory. It seems important to be able to consider that.

These are technical questions and comments about the definitions of sectors, coding strategy, and rationale for distinctions that don't seem on the face to be justified. Please see the provided document.

The approach needs to be forward looking and reflect conditions today and into the future.

Attachment: www.arb.ca.gov/lists/com-attach/83-ctr2018-UycBYlIwWGMGbgVs.pdf

Original File Name: Technical Questions and Comments.CTRrule.pdf

Date and Time Comment Was Submitted: 2019-06-07 23:45:13

# Comment 34 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Rob Last Name: Bamford

Email Address: robert.bamford@sonoma-county.org

Affiliation: NSCAPCD

Subject: NSCAPCD Formal Comments on Proposed CTR Regulation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/84-ctr2018-UT9dKABiUGICdFQ3.pdf

Original File Name: NSCAPCD formal CTR comments 6-7-2019.pdf

Date and Time Comment Was Submitted: 2019-06-10 08:08:19

## Comment 35 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Ted Last Name: Vincent

Email Address: Non-web submitted comment

Affiliation: ECSF

Subject: Comments on CTR Regulation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/85-ctr2018-VmVdbl0DWG4FYANw.pdf

Original File Name: 35 ECSF.pdf

Date and Time Comment Was Submitted: 2019-06-10 09:29:25

## Comment 36 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-1.

First Name: Benjamin Last Name: Beattie

Email Address: bbeattie@ysaqmd.org

Affiliation: YSAQMD

Subject: Comments on Proposed 15-Day Changes to CTR

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/86-ctr2018-WzlQMwNjU3RWJAVs.pdf

Original File Name: Beattie.pdf

Date and Time Comment Was Submitted: 2019-06-10 10:12:21

# Comment 1 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Samuel Last Name: Bayless

Email Address: bayless@cfca.energy

Affiliation: CA Fuels and Convenience Alliance

Subject: CFCA Comments CTR 2nd 15-Day

Comment:

Comments attached

Attachment: www.arb.ca.gov/lists/com-attach/87-ctr2018-B2RRMQRmVWdWD1Mw.pdf

Original File Name: CFCA Comments Second AB617 CTR Modifications 7.31.19.pdf

Date and Time Comment Was Submitted: 2019-07-31 13:10:19

#### Comment 2 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Adam Last Name: Harper

Email Address: aharper@calcima.org

Affiliation: California Construction & Industrial Mat

Subject: CalCIMA Comments 2nd 15 Day Notice

Comment:

Attached please find the joint comments of the California Construction and Industrial Materials Association and the California Asphalt Pavement Association.

Attachment: www.arb.ca.gov/lists/com-attach/89-ctr2018-UDFQNFQKUjdQZ1Rj.pdf

Original File Name: Ab 617 - CTR regs 2nd 15 day comments final.pdf

Date and Time Comment Was Submitted: 2019-08-01 11:15:12

#### Comment 3 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Mad Last Name: Stano

Email Address: mad@caleja.org

Affiliation: Cal Environmental Justice Alliance

Subject: Comments on July 17, 2019 Emission Reporting Proposal

Comment:

Please see the attached comment.

Attachment: www.arb.ca.gov/lists/com-attach/90-ctr2018-VjdRIgdhUHYKfwN3.pdf

Original File Name: August 1 2019 Ltr to CARB Emission Reporting.pdf

Date and Time Comment Was Submitted: 2019-08-01 12:02:24

#### Comment 4 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Bill Last Name: La Marr

Email Address: billlamarr@msn.com

Affiliation: California Small Business Alliance

Subject: COMMENT LETTER: SECOND PROPOSED UPDATES TO MODIFIED TEXT -

CTR REGULATION

Comment:

Dear Clerk of the Board:

Attached is the comment letter from the California Small Business Alliance regarding the Second Proposed Updates of the Modified Text to the CTR Regulation.

Thank you for allowing us to comment on this important matter.

Sincerely,

Bill La Marr Executive Director California Small Business Alliance (714) 778-0763 (O) (714) 267-1464 (M) billamarr@msn.com www.calsmallbusinessalliance.org

Attachment: www.arb.ca.gov/lists/com-attach/91-ctr2018-UTJUIVIxAzELUgNv.pdf

Original File Name: csba\_letter\_2nd\_mod\_ctr.reg-aug.1, 2019.pdf

Date and Time Comment Was Submitted: 2019-08-01 12:36:12

# Comment 5 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Noelle Last Name: Cremers

Email Address: Non-web submitted comment Affiliation: California Farm Bureau Federation

Subject: Criteria Pollutant and Air Toxic Reporting Regulations

Comment:

Please see attached comments.

Attachment: www.arb.ca.gov/lists/com-attach/93-ctr2018-VDVVMVwCVzIHMFRj.pdf

Original File Name: AB 617 Final Reg 7-31-19.pdf

Date and Time Comment Was Submitted: 2019-08-01 12:48:00

#### Comment 6 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Leah Last Name: Silverthorn

Email Address: Leah.Silverthorn@calchamber.com Affiliation: California Chamber of Commerce

Subject: Comments re 2nd 15-Day Notice CTR Regulation

Comment:

Please accept our coalition comment letter. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/94-ctr2018-UTBVMQBeWTxQZ1Bn.pdf

Original File Name: AB 617 Community Monitoring Regulations- SECOND 15 day notice comments.pdf

Date and Time Comment Was Submitted: 2019-08-01 13:14:34

## Comment 7 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Janet Last Name: Whittick

Email Address: janetw@cceeb.org

Affiliation: CCEEB

Subject: CCEEB Comments on 15-day Notice

Comment:

Please find attached comments from the California Council for Environmental and Economic Balance. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/95-ctr2018-AjAFM1NjBW8HL1Vl.pdf

Original File Name: 2019.08.01 CTR 15 day changes\_final.pdf

Date and Time Comment Was Submitted: 2019-08-01 13:32:17

#### Comment 8 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Sarah Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CASA

Subject: CASA Comment Letter on the Second 15-day Modifications to the CTR

Comment:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the second 15-day modifications to the draft regulation for the reporting of criteria air pollutants and toxic air contaminants under AB 617. We further appreciate your willingness to consider our recommendations and proactively work together toward solutions. Please contact me if you have any questions at (925) 705-6404 or sdeslauriers@carollo.com.

Sincerely, Sarah A. Deslauriers, PE, ENV SP Climate Change Program Manager, CASA

Attachment: www.arb.ca.gov/lists/com-attach/96-ctr2018-UzACZVUnV2VRCAJj.pdf

Original File Name: CASA AB 617 FINAL Comment Letter\_Second15-DayComments\_080119.pdf

Date and Time Comment Was Submitted: 2019-08-01 13:36:56

## Comment 9 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Gino Last Name: DiCaro

Email Address: gdicaro@cmta.net

Affiliation: CMTA

Subject: CMTA Coalition Comments on AB617

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/98-ctr2018-UjMAZFwCWTxWYVVi.pdf

Original File Name: AB 617 letter 8\_1\_19.pdf

Date and Time Comment Was Submitted: 2019-08-01 15:30:52

## Comment 10 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: James Last Name: Talavera

Email Address: james.talavera@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on CTR Reg (15-day Changes)

Comment:

Please see the attached comments.

Attachment: www.arb.ca.gov/lists/com-attach/99-ctr2018-VjoAZ1E0UXUKfARb.pdf

Original File Name: LADWP\_CTR Comments on 15day changes\_final.pdf

Date and Time Comment Was Submitted: 2019-08-01 15:29:40

## Comment 11 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Jim Last Name: Swaney

Email Address: jim.swaney@sdcounty.ca.gov

Affiliation: San Diego APCD

Subject: SDAPCD Comments on Second Notice for CTR

Comment:

 $\operatorname{SDAPCD}$  Comments on Second Notice of Modified Text for CTR Regulation

Attachment: www.arb.ca.gov/lists/com-attach/100-ctr2018-B3RQMgNjUXIDZII2.pdf

Original File Name: SDAPCD comments on Second Modified Text for CTR Regulation.pdf

Date and Time Comment Was Submitted: 2019-08-01 17:13:47

## Comment 12 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Jack Last Name: Monger

Email Address: jack.monger@ieaca.org

Affiliation: Industrial Environmental Association

Subject: Comments regarding CTR Regulation

Comment:

Thank you for this opportunity to submit our comments.

Sincerely, Jack Monger CEO

Industrial Environmental Association

Attachment: www.arb.ca.gov/lists/com-attach/101-ctr2018-UDNXJQZ1UFwKbwNs.pdf

Original File Name: CTR Comment Letter Aug 1 2019.pdf

Date and Time Comment Was Submitted: 2019-08-01 18:22:59

#### Comment 13 for Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (ctr2018) - 15-2.

First Name: Tiffany Last Name: Roberts

Email Address: Non-web submitted comment

Affiliation: WSPA

Subject: WSPA Comments on AB617 Second 15-Day Notice of Modifications to CTR

Regulation Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/102-ctr2018-ViFTJlQlBTdVDARl.pdf

Original File Name: WSPA AB 617 CTR 15-Day Notice Comments (08-01-19).pdf

Date and Time Comment Was Submitted: 2019-08-02 08:06:37