

California Air Resources Board
Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (or CTR)
Proposed 15-Day Modifications

Department of Defense Comment Matrix
Submitted: 08 April 2021

#	Location			Navy Comment	Specific Requested Revision
	Page	Line	Section		
§ 93401. Applicability					
1	3		(a)(4)(A)	<p>We appreciate the increased proposed District Group B facility actual emission threshold of 10 tons/year (tpy). However, 10 tpy is still significantly lower than the threshold that the legislation had intended (i.e., 250 tpy).</p> <p>While we previously requested a threshold of 20 tpy for District Group B, we believe a threshold of 15 tpy to be sufficient and request that ARB consider increasing the threshold to 15 tpy.</p>	<p><i>“For a facility located within District Group B, 10 15 tpy of any criteria air pollutant (except for carbon monoxide).”</i></p>
§ 93403. Emission Reporting Requirements					
2	8		New Proposed Subsection under § 93403. Emission Reporting Requirements	<p>We request that CARB add a new sub-section into the Emission Reporting Requirements (§ 93403) to allow for remote facilities to report on a biannual basis and to eliminate required annual reporting for facilities that can demonstrate no significant change in operation over the reporting cycle.</p> <p>The impetus for our comment relates to unique features of military installations. Military installations tend to be located far from centers of receptors. Operations at military installations do not tend to vary significantly from year to year, because major changes require advanced funding, planning, and often environmental review across the large federal system. Therefore, emissions generally do not change significantly within a 12-month period. Reporting biennially is also twice the current frequency under AB 2588, as such, substantially increasing the data and information that would be available to the public.</p>	<p>Create new sub-section under § 93403. Emission Reporting Requirements entitled <i>“Reduced Reporting for Remote Facilities or No Significant Changes in Operations:</i></p> <ol style="list-style-type: none"> <i>1. Owners or operators of a GHG, Criteria, or Elevated Toxics Facility subject to reporting per sections 93401(a)(1), (2), or (3) which are remote facilities exceeding 1 mile from a receptor, shall submit Emission Reports on a biannual schedule.</i> <i>2. Owners or operators of a GHG, Criteria, or Elevated Toxics Facility subject to reporting per sections 93401(a)(1), (2), or (3) which can certify and demonstrate no significant change in operations within that annual reporting cycle, is not subject to the annual emissions report requirement.”</i>