



June 7, 2019
ES 19-003

Clear of the Board
California Air Resources Board
Submitted via email

Docket# CTR2018 - Public Comments Pertaining to the Criteria Air Pollutants and Toxic Air Contaminants Reporting Rulemaking

Dear Clerk of the Board:

The Sacramento Municipal Utility District (SMUD) appreciates the efforts CARB staff puts forward with these types of rules. We also appreciate the opportunity to provide the following comments:

1. Emphasis on simplifying and streamlining reporting –
 - a. We request that CAPCOA approved worksheets be developed and implemented for common emission categories (e.g., internal combustion engines, boilers, etc.).
 - b. A standardized worksheet will allow permit holders to focus on data gathering aspects of the reporting (e.g., geospatial coordinates, activity level calculations, etc.) and avoid the need for specialized staff and/or consultant support. SMAQMD’s “Construction Mitigation Tool” is a great example of such a worksheet.
 - c. Allow all facilities to qualify for abbreviated/streamlined reporting for compliance years that have: 1) similar activity levels with the previous compliance year; and 2) have not undergone any physical modifications or alterations that would require a permit modification or construction permit.
2. Implementation costs to air districts and impact to permit fees –
 - a. The staff report does not appear to fully address the staffing and/or budgetary constraints currently being experienced by some local air districts. Adding up to 55 additional staff statewide may seem negligible on such a large scale. However, air districts may ultimately need to increase permit holder fees to account for the additional positions.

3. Potential conflicts and/or redundancy with existing AB2588 requirements –
 - a. It is unclear from the documents how this proposed rule will impact and/or work with the existing AB2588 reporting requirements. Redundant emission reporting programs can lead to variances in data and confusion on how the resulting data is to be used.
 - b. Is the “high priority” determination used in the definition of “*Elevated Prioritization Toxics Applicability (Elevated Toxics Facility)*” the same as the screening methodology used in the AB2588 program? If not, how is this to be calculated?

We look forward to working with your staff on these items.

Sincerely,

Rene Toledo
Environmental Compliance Supervisor
SMUD