

From: Ben Beattie <BBeattie@ysaqmd.org>
Sent: Monday, June 10, 2019 8:01 AM
To: Edwards, David@ARB <david.edwards@arb.ca.gov>
Subject: Comments on Proposed 15-day Changes to CTR

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Hi David,

I was not able to get my comments submitted by Friday, June 7, but I hope that you will find a way to include them in the record. The Yolo-Solano Air Quality Management District (YSAQMD) provides the following comments on the proposed 15-day amendments to the Criteria and Toxics Reporting Regulation (CTR) posted May 13, 2019.

First and foremost, the YSAQMD would like to reiterate its stance that the proposed 15-day amendments to the CTR have drastically altered the scope of the regulation both from the version approved by the CARB Board in December of 2018 and from the text included in the Assembly Bill 617 legislation. Furthermore, as proposed, the regulation will result in significant cost increases to air districts and to regulated sources within California, with projections of over \$80 million over the first eight years of the program (a \$60 million increase over the Board approved Regulation). The intent behind AB 617 and the CARB Community Air Protection Program is to reduce exposure in communities most impacted by air pollution. The large increase in cost of the CTR would significantly raise compliance costs for permitted sources and could come at the expense of real emission reduction in those communities.

Additional concerns about the proposed 15-day changes are as follows:

There is an inconsistency with the reporting dates for certain categories of sources. Section 93403(b)(1)(A)(2) states that "Data reports must be submitted beginning no later than the 2023 data year reported in 2024 and for all subsequent years, for sources subject to 93401(a)(4)(A) or (B), or both, in District Group B, and sources subject to 93401(a)(4)(C) in District Group A and Sector Phase 2, and in District Group B and Sector Phase 1."

However, Table A-1 in Appendix A states that the first year for reporting for sources subject to 93401(a)(4)(A) or (B) or Sector Phase 1 in District Group B is 2022 data reported in 2023. The YSAQMD suggests clarifying the reporting deadlines in Section 93403(b)(1)(A)(2) and/or Appendix A Table A-1.

The definition of "agricultural operations" and the reporting of such operations is unclear. Previous discussions with CARB staff indicated that only facilities subject to district air permits would be required to report under the CTR, and most agricultural operations do not require district permits. The YSAQMD suggests adding clarifying language to specify which agricultural activities are subject to CTR reporting, and if it is limited to those activities that are permitted by an air district.

Thank you,

Benjamin Beattie
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