

From: [Olivero, Kevin](#)
To: [ARB Criteria & Toxics Regulation Reporting](#)
Subject: Comments on behalf of Siemens Mobility
Date: Monday, April 01, 2019 9:49:35 AM
Attachments: [ctr-regulation-15-day-draft-march2019 Comments 20190326 1.pdf](#)
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Comments:

1. Missing from the Draft is how trial/Test materials are calculated or counted. Recommend materials being tested for quality in process be given a cap of 55 gallons/year.
2. Request reporting requirements to be posted 18 months prior to the first required report e.g. June 2019 furnish specific reporting requirements and final draft of 317, for a 2021 reporting year
3. A-14: Revise Majority to 51%<, or majority to be highest proportion of material.
4. A-21: For Sacramento, will the air district escalate reporting to CARB until electronic system is developed
5. A-21: Request to have reporting data requirements by June 2019
6. A-34: Classification Change order to B districts first then A, Classification A districts will experience more impact due to required reporting than B districts
7. A-37: Request to change isocyanate compound use to sector Phase 3.

With best regards,
Kevin Olivero

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