



May 21, 2020

California Air Resources Board **SENT VIA EMAIL: anne.klein@arb.ca.gov**
Sacramento, CA 95812

Attn: Anne Klein, Staff Toxics Inventory and Special Projects Section
Gabe Ruiz, Manager Toxics Inventory and Special Projects Section
Greg Harris, Chief Greenhouse Gas Toxics Emission Inventory Branch

Subject: Comment Letter regarding Proposed Amendments to AB 2588 Emission Inventory Criteria and Guidelines Regulation

Dear Ms. Klein:

Thank you for this opportunity for the Industrial Environmental Association (IEA) to provide comments regarding the proposed amendments to AB 2588. Before we address the details of the proposed amendments, we must first point out the need for postponing this public input process while key stake holder companies, and particularly the EH&S professionals at those essential businesses are overwhelmed by the upheaval created by the corona virus and the challenges of protecting the safety of their work force. EH&S professionals are the front-line individuals that will be tasked with implementing these proposed amendments and should be a key source for feedback to ARB staff and all regulatory agencies during the public comment review periods.

But the additional responsibilities created by this health crisis and the challenges of protecting employee safety make it difficult or impossible for EH&S professionals to participate in this process. Consequently, we urgently request that ARB consider a 90-day delay in this public review process to allow adequate opportunity for industry to review and respond to these proposed amendments.

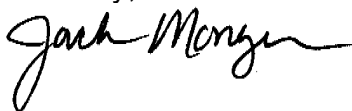
In the meantime, IEA offers the following preliminary comments and questions for your consideration:

1. These proposed amendments, while short on implementation details, will certainly represent a significant increase in workload and strain on resources for businesses and Air Districts. What does ARB estimate that it will take from a resource standpoint, to implement all the proposed recommendations?

2. To the extent these proposed amendments will generate an enormous amount of new data for the State, what measure of public health benefits are expected? In these unprecedented times when both businesses and state treasuries are faced with significant revenue reductions for years to come, will ARB have the staff to review all this new data to insure its accuracy and quality? It would be an unnecessary burden on business to require them to collect data when it is uncertain that the State has the resources to evaluate and utilize such data.
3. What is ARB's approach to ensure that the scope of the proposed amendments is limited to significant sources of potential emissions. We believe this would be important in order to minimize disruption and impacts on resources that would be required if insignificant sources are required to respond to the proposed recommendations?
4. California's legislators continue to highlight the budgetary challenges California faces over the next couple of years as we recover from the damage done to our public healthcare system and our economy. With serious "belt-tightening" eminent, do these proposed amendments represent the best use of very limited funds when it comes to protecting air quality and public health?
5. To help answer the previous question, please specify what material benefits to air quality and public health will be achieved with this additional reporting.
6. On what timeline does ARB foresee accruing any benefits resulting from implementation of these proposed amendments?
7. You are proposing to include emissions from portable equipment under AB 2588 reporting. This is an extremely complicated and record intensive undertaking for stationary sources to document. Portable equipment is currently reported under other ARB programs. Including them under AB 2588 could result in double counting. ARB needs to evaluate the cost of collecting this data versus the environmental benefit of including this data under the AB2588 program.
8. ARB has specific consumer product regulations for regulated emissions across the State of California. These regulations are designed to minimize emissions including toxic air contaminants. Stationary sources use these products for routine maintenance at their facilities. In addition, there are other large facilities like college campuses or military facilities that have little or no control over products that are brought onto their stationary source by individuals that are living at the stationary source. IEA recommends that consumer products be exempt from AB 2588 reporting.

Please feel free to contact me if you any questions regarding our comments or our request for delay in this process to allow additional review and submission of meaningful recommendations regarding the proposed amendments.

Sincerely,



CEO