

August 12, 2020

California Air Resources Board  
Gabe Ruiz  
Manager  
Toxics Inventory and Special Projects Section  
1001 I Street, Sacramento, CA 95814  
Submitted via email: [ab2588ei@arb.ca.gov](mailto:ab2588ei@arb.ca.gov)

SUBJECT: Comments on July 29, 2020 Version of the Proposed Amendments to the Emission Inventory Criteria and Guidelines Regulation (EICG)

Dear Mr. Ruiz,

The Monterey Bay Air Resources District (MBARD) appreciates the opportunity to be involved in the revisions to the EICG regulation. We appreciate the time CARB has spent engaging in receiving feedback from the air districts. However, MBARD believes that a two-week review period is not enough time to provide good and constructive comments regarding the proposed amendments. The materials for review are overwhelming, specifically, Appendix A and C. It would be helpful if CARB could extend the review period or provide an executive summary of the changes made to Appendix A and C.

Nonetheless, please see below our comments regarding proposed Amendments to the EICG regulation.

#### Phase-In Schedule Diagram

1. How was the category ChemSet-1 and ChemSet-2 chosen? Bases upon a brief review of the ChemSet-1 chemicals, it was found that some chemicals do not have any known RELs in the OEHHA chemical database. What purpose does this serve in prioritizing those new chemicals to be reported? One example is Aniline Hydrochloride (142041). It is listed known as a cancer since 1998 by OEHHA, but no RELS have been developed over 22 years.

#### Emission Inventory Criteria and Guidelines Report

1. Why was Section 6 -11 of the draft EICG report deleted from the EICG dated 9/26/2007? Also, why did this not show as a strikeout item?
2. In Table 1, on page of the draft EICG document, bullet point number 2 does not currently make sense as Section 11 and Section 6-11 has seemingly disappear from the draft document. Could you please clarify this inconsistency?
3. In Table 1, page 6, bullet point number 6 asks, "Do you have diesel engines" and references Section XI. This section has disappeared from the draft EICG regulation.

4. In Figure 1, page 7, includes outdated forms, air districts submits data electronically or through HARP2 now. MBARD suggests removing the statements referring to 2588 forms.
5. On Section II (E)(1), page 12, the note regarding that Appendix E is being revised should be an underlined item to prompt the reader and the public to know that this is a new edit.
6. On Section II (H)(4), Availability of Emission Quantification Methods, page 17, could you provide an example of when this would be the case? For the most part, you could use mass balance to calculate the emission of a substance. Moreover, this particular provision is not included the proposed CTR amendments. There will be inconsistencies with the CTR and EICG guidelines as facilities will be required to quantify the emissions for substances that do not have no known quantification method under the CTR regulation.
7. Section (II) (J)(3) (a), Reinstatement, page 18, what does CARB mean by “or a change in other factors”?
8. Section (II) (J)(3) (a)(iv-vi), for the purpose of this section, what is CARB’s interpretation of “significant change”? Is it the air district’s discretion?
  - a. Is 1.5, 2 times, 5, or 10 times considered a significant change in emission measurement?
  - b. Does changing a stack height from 10 ft to 9 ft or changing the exhaust flow rate from 1000 to 1005 cfm considered a significant change to the air dispersion modeling?
9. Section (II) (J)(3) (a)(vii), what does this section mean in layman terms (Recognition that the emissions may have additional properties of concern including persistence and/or bioaccumulative properties)? Air districts do not review or use persistence or bioaccumulative properties of air toxics. Would CARB provide this information to an air district?
10. Section III(A), there are some deleted items in the draft EICG that have not been highlighted as a strikeout, please show changes in underline strikeout so it is clear what has changed.

(1) Conditions.

This regulation shall cease to apply to any facility whose emissions of total organic gases, particulate matter, nitrogen oxides, or sulfur oxides are reduced to the extent that the facility no longer satisfies the conditions specified in section II.A. and II.B. *[these sections address facilities emitting 25 or more, or 10 or more, tons per year, respectively, of criteria pollutants]*, if the facility demonstrates to the district, and the district finds and the state board concurs that the following criteria are satisfied.

(a) The facility does not satisfy the conditions specified in section II.A.(2) or II.E. *[these sections address, respectively, facilities on district toxics survey lists and facilities emitting less than 10 tons per year of criteria pollutants];*

11. Could you please explain the reasoning to now include population-wide risk? This concept is not included in the CTR. Is CARB going to develop guidelines in coordination with air districts to assess population-wide impacts?

Appendix C Facility Guideline Index

This appendix is very complicated to understand and we are concerned that subject facilities will struggle to understand how to read and figure out what to report. It is asking a lot of a small business owner to interpret this complicated information which covers hundreds of pages. The additional reporting requirements may result in a burden on CARB and air districts at a time of great uncertainty of how our future budgets and staffing levels can accommodate the large amount of additional work created with these additional reporting requirements.

1. It would be helpful to include the CAS number in the look up table.
2. It would be helpful if CARB could provide supporting documentation and reasoning of where they concluded that some specific substances are emitted from the specific industry/emitting process. For example, how did CARB determine that ethyl cyanoacrylate and methyl cyanoacrylate exist in crematory exhaust? These come up in other categories such as “jewelry, silverware, and plated ware” or “electrical and electronic equipment” but it does not appear in other combustion type processes. It would help air districts explain the new reporting requirements for additional substance if CARB produced a supporting document explaining how they attributed the new substances to a specific process.

Please let us know if you have questions regarding any of our comments.

Thank you for the opportunity to comment,



Amy Clymo  
Engineering and Compliance Manager

cc: Seong Kim, MBARD Air Quality Engineer II