

**Joint Workshop:
Proposed Amendments to the Air Toxics "Hot Spots" EICG Regulation
and the CTR Regulation**

Submitted Written Questions & Comments Log

Webinar Date: September 30, 2020

Webinar Recording: <https://attendee.gotowebinar.com/recording/8972528764562142989>

Webinar Slides and Materials: <https://www.arb.ca.gov/ab2588/2588guid.htm>

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Notes for the Questions & Comments Log:

1. The log below displays written questions and comments about the proposed regulation amendments submitted into the webinar's question box. Please note that questions regarding the webinar logistics (e.g., the call-in number, availability of a webinar recording, etc.) are not included.
2. Staff made some minor corrections for typographical errors but did not otherwise edit the content of the questions or comments related to the proposed amendments.
3. CARB staff provided verbal responses to these questions and comments during the webinar's questions and answer (Q&A) session. To hear staff's responses, please access the recording at the link above.
4. In general, staff responded to questions and comments in the order they were received. However, since many questions were submitted during the presentation or shortly after the start of the Q&A session, the time when staff responded may be significantly later than the "Time Submitted" shown below.
5. Questions or comments provided verbally during the webinar are not included in the log below, but they are available for review in the webinar recording.

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Submitted By	Time Submitted	Question or Comment
Amy Kyle	9:33:36 AM	It helps to follow the webinar in this format if you can be sure to clearly introduce each speaker with their full name and title and what part of ARB they are from. Often, people use first names, and we cannot follow. Thank you. Amy D Kyle
Amy Kyle	9:37:19 AM	Even better if they can post the names, titles, and affiliations on a page that we can refer to. Thanks. Not sure, for example, whether the Emissions inventory and Economics branch is part of the Air Quality Planning and Science Division or not?
Justin Stocker	9:59:28 AM	When and how will know each phase a place falls into?
Candice Longnecker	9:59:32 AM	Why is CARB including substances whose emissions cannot be quantified?
Todd Osterberg	9:59:32 AM	"Todd (Chevron): If CARB is only requiring reporting on PERP engine use at facilities subject to MRR or emit > 200 tpy, this discounts the health risks posed by these engines used in non-facility-based applications such as construction sites. The emissions from non-facility PERP engines taken as a whole are likely to pose higher risks to the public as the sources of these emissions are in closer proximity to receptors. Will CARB consider a more comprehensive reporting requirement utilizing the entire PERP database?
Truc Ngo	9:59:40 AM	Since there are many similarities, should the 2 programs be combined for streamlining purposes? City of LA
Brad Poiriez	9:59:40 AM	Will those portable engines registered in PERP be required to report, via CARB? MDAQMD
Seong Kim	10:00:33 AM	Seong Kim with MBARD - Could you please explain on the cost impact on small businesses? In your staff report, it states that it will cost small businesses approximately \$560 the first year and \$300 after. Has CARB staff reached out to private consultants on how much they will charge small business if they elect to hire them? In addition, the staff report also states it will not have significant impact because the required data and reporting will typically be information such a process throughput data. It is to my understanding that these small business will also have to report

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		emissions and release location data. Thus, the information reported to CARB is much more than just throughput data, and that CARB may be significantly underestimating the cost impact on small businesses.
Michael Edwards	10:01:28 AM	Will oil and gas production facilities be included as types of industries that require reporting? Mike Edwards, CA DOC-CalGEM
Dragomir Bogdanic	10:01:43 AM	Will the reporting requirements for generators 50hp and higher apply to construction projects? Caltrans.
Amy Kyle	10:01:45 AM	With regard to the "gap" year and extended reporting deadlines that John explained: Why not take the same approach here as you did for the "new chemicals.?" Meaning -- why not require facilities to report the data that they CAN quantify during the "gaps" years, rather than skip these reporting time frames. They would report the data that they have. This would be very informative because it would tell ARB and the public what areas needed more methods development. But still provide some data about the things that they know about. And reduce any gaming to dump emissions into the unreported years. Amy D Kyle, Environmental Health Scientist (retired) but affiliated with UC Berkeley
Candice Longnecker	10:02:11 AM	900 new chemicals is a lot of new chemicals. What triggered the addition of 900 new chemicals?
Thomas Maulhardt	10:02:15 AM	What are the proposed economic impact of these regulations on reporters? Will the data be reported to a facility's air district or directly to CARB?
Jim Roehl	10:02:40 AM	Jim from Recology--Will facilities be reporting the data/information to the local Districts or to ARB? (i.e. who should we be working with to understand what our requirements are?)
David Rothbart	10:03:21 AM	David Rothbart, representing CASA. For waste facilities that cannot estimate emissions without performing source tests, what should be reported in the initial year? Test methods do not exist at the moment for most of the 600 compounds to be initially reported.
Kari Casey	10:03:29 AM	Will the Districts notify facilities of their potential applicability to the expanded sectors and applicable phase? Kari Casey- WHF, Inc.
Amy Kyle	10:04:10 AM	How are they going to deal with the vastly different practices and approaches of the various air districts? There are many many places in the many many guidelines where districts can take things out of status that would bring them into the inventory. How

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		is CARB going to correct for this? Amy D Kyle (retired from UC Berkeley. However, please note that my questions are not "from" UC Berkeley.
Candice Longnecker	10:04:18 AM	How much additional cost and time will be required by the regulated community and Air Districts to implement these proposed changes?
Dioni Araza	10:04:41 AM	Is an emergency generator (>50HP) considered as a portable equipment even it is already bolted on the floor? US Pipe.
Truc Ngo	10:07:04 AM	And what are their main differences that cause them to be separated into 2 programs? City of LA
Rob Cram	10:07:37 AM	Rob Cram with Holt of California. Just to clarify- any reporting done by entities under these regulations would be done through the Air District where the entity is domiciled, correct?
John Lane	10:08:09 AM	How do we avoid creating fear and mistrust between communities, Districts and industry if we provide data that has zero or limited health data?
Bill LaMarr	10:08:28 AM	Under the Phase-In schedule air districts with facilities in AB-617 communities must report in 2023. I assume that means these facility owner-operators must begin gathering and evaluating all of the chemical substances they use in their operations and quantify it in preparation for 2022 reporting. Are there health-risk values and emission factors available for them to use in 2021?
Amy Roberts	10:10:00 AM	How would a facility that applies coatings know which of these toxic compounds are present? Would all the compounds on the expanded list be included on an MSDS?
Sharon Shearer	10:12:54 AM	Toxic emission impacts are inherently different that GHG emissions in that location of the emissions is as important as the quantity of emissions. A small facility using PERP engines could have a much larger impact on neighbors due to location. How will you communicate to the public you are not providing the total toxics from these facilities that may be their neighbors? (Sharon Shearer - Martinez Refining Company)
Daniel Carawan	10:13:08 AM	Navy: to confirm, if a rental generator is used at our facility that is over 50 bhp, this rental generator will have to be reported by our facility? I'm assuming that we fall under the MRR or 250-ton criteria pollutant/year.

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Brigitte McLeavy	10:13:08 AM	Portable engines that power generators would not be impacted if permitted as a various locations? Is that regardless of hp?
Daniel Carawan	10:13:47 AM	So, the rental company and the facility using the generator would be reporting for this generator?
Mani Firouzian	10:14:00 AM	"Mani Firouzian SCAQMD: About the proposed phase in schedule in the first 4 years for Table A-3 sources, what if one facility is subject to reporting under multiple sector phases? For example, facilities with Diesel engines (Sector No. 8) are subject to reporting under Sector Phase 1 but they may exist at facilities subject to reporting in other two phases.
Kiersten Melville	10:15:38 AM	Kiersten Melville, Metropolitan Water District, If you meet the threshold for reporting under Phase I, do you also need to report Phase II emissions at the same time?
Allen Sonnevile	10:16:33 AM	Will Geothermal facilities be required to report? Allen, Calpine
Edward Krisnadi	10:19:12 AM	For new toxic chemicals with no emission factors (or can't be quantified), what plan does CARB has to develop the emission factors? Have cancer and non-cancer risks for these chemicals been determined?
Ranji G	10:21:22 AM	Ranji George. ex-scientist, SCAQMD. Tens of millions of battery vehicles are expected in California. Lithium battery recycling facilities in the dozens will most likely be located in AB 617 areas. How will CARB air toxic regulations regulate cobalt, nickel, and other toxic chemicals (such as electrolyte and resin binders) potentially emitted?
Gary Jones	10:31:26 AM	Are there any plans to revise and update the pollutants in Appendix C? The chemicals identified for printing are either no longer used or are inaccurate.
Russell Vernon	10:34:40 AM	Do we have a list of all of the total new Do (proposed) list?
Amy Kyle	10:35:14 AM	With regard to the use of criteria pollutant emissions to classify toxic emitters into large v. small facilities in both CTR and EICG -- Given that California is moving off combustion as a power source, in its climate change program, we would expect facilities to reduce their criteria pollutant emissions as they electrify their power. But this may not affect the toxic emissions for industrial processes other than those related to power. What are you going to do about this? Can a facility fall out of the toxics regulations

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		just because it switches from natural gas to electricity for its power? Amy D Kyle, Environmental Health Scientist, retired from UC Berkeley
Russell Vernon	10:35:21 AM	Where can I find the lists?
David Rothbart	10:38:20 AM	David Rothbart representing CASA. CARB & CAPCOA staff have expressed that compounds without final toxicity factors will not be used to calculate prioritization scores or health risks. This limitation may be confusing for members of the public. Will the amended regulations provide clarification that health risk calculations cannot be performed until OEHHA provides "final" toxicity data for the compound(s) in question?
Todd Tamura	10:40:48 AM	Are all of the background data used for generating the list available, in particular, the information regarding known uses (similar to the example shown for degreasers)?
Scott Cohen	10:42:29 AM	I have heard the terms persistence and bioaccumulation several times now. While I agree these are issues, I also observe that metals in fugitive dust are quantified using total analysis rather than the amount of metals that is bioavailable. Please explain this difference which seems contradictory. If one is concerned about human health the impact on the human body (i.e., the bioavailable amount) should be what is studied. Either both persistence/accumulation and availability should be used or neither. Thank you for your time.
Rita Loof	10:46:39 AM	Slide 30 mentioned "other appropriate methods", can you explain what would be considered an appropriate method?
Alison Torres	10:51:25 AM	Alison Torres- Eastern Municipal water District When would a wastewater treatment plant in District Group A be required to commence reporting new substances? Such facility is listed as a Sector Phase 2 facility in the CTR. However, such facility could fall in Sector Phase 1 if the facility emits more than 4 tpy of criteria pollutants or has a diesel emergency generator. Would this subject facility be required to commence reporting 2022 data in 2023 due to this Sector 1 applicability? If so, please confirm whether the 2023 reporting would require the new ChemSet1 substances?
Scott Taylor	10:51:40 AM	"For both the EICG and CTR reporting where a source test is required, would a single source tests be allowed to be used for multiple site which have the

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		same or similar equipment rather than doing site specific testing at every location? Scott Taylor of TES
Sonnie Pineda	10:53:49 AM	For building downwash, if the layout of the facility does not have any structures that would affect the stack emissions of the facility, can the building downwash modeling be disregarded?
Amy Kyle	10:57:37 AM	"What is the process for public review of the CAPCOA documents that are included as part of the regulatory package? Does the CARB consider the comments on these? Amy D Kyle, Environmental Health Scientist, retired from UC Berkeley but affiliated.
Anne McQueen	11:00:40 AM	Anne McQueen with Yorke Engineering--what is the implementation deadline for the EICG changes in general, such as the items on page 37, or items not specific to a single sector or set of chemicals, where schedule is shown elsewhere.
Steven Yang	11:02:00 AM	If quantification methods do not exist, the amendments allow reporting the presence, use, or production of the substance. If "production" or "produced" includes unintended or unknown byproducts of a process (e.g. combustion) that results in waste streams, this provision does not resolve the quantification issue. Will CARB consider modifying the meaning of production to those chemicals that are intended or known products of the process? Also, if an analysis used to support quantification of a chemical shown non-detect, how will CARB expect the facility/owner to quantify the chemical?
Mike Fritz	11:02:01 AM	Question from Mike at BASF: Aromatic isocyanates rapidly react with water, so can you provide more detail why isocyanates are one of the targeted functional groups?
Gideon Sarpong	11:05:37 AM	Is there a cheat sheet available to help facilities evaluate qualification for compliance?
Fortune Chen	11:05:59 AM	Please explain why PM instead of PM10 would be used to calculate the toxic fraction for fugitive dust (PM10 is considered 'inhalable' by EPA)
Bill LaMarr	11:06:30 AM	It would be helpful if staff could show some examples of how they arrived at an approximate cost of \$560. in year-1 and \$300/year thereafter. I believe that some cost elements are missing.
Scott Cohen	11:06:56 AM	Regarding HRA using PM rather than PM10 in fugitive dust. The modeling being performed assumes that PM10 behaves like a gas whereas PM does not. In addition, many of the studies upon which risk factors are set were based on respirable dust (PM10, or PM4

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		<p>in the case of crystalline silica) as opposed to inhalable dust (PM). Moreover, the HARP2 model contains only two choices for deposition rate which should be chosen on the basis of whether there is control or not. Districts tend to select the higher deposition rate for any dust source whether it is controlled or not. Now that the mass of pollutant will increase from PM10 to PM, how will deposition rate be considered given that AERMOD has deposition algorithms that are currently unused but would presumably reflect the best science available? In my view, PM10 should be used for respiratory exposure pathway and PM could be used for other pathways (e.g., dermal, ingestion, etc.). Please consider how the deposition rate/mass will be determined in the future.</p>
Seong Kim	11:09:48 AM	<p>"I modified my initial question regarding crotonaldehyde. Could you please address this modified question instead? On Appendix C-1 page 27, it now lists that "Crotonaldehyde" is present in natural-gas fired combustion. This substance is also listed in Appendix A-1 as substances to be quantified. Facilities have been reporting and quantifying toxics from natural gas boilers for decades, and per EPA's AP-42 document, it does not list "Crotonaldehyde" being present as a TAC from natural gas boilers. How can a facility quantify emissions per Appendix A-1 for this substance without an emission factor?</p>
Kathy Edwards	11:10:59 AM	<p>I see in the slides that portable equipment reporting is proposed. We already report our portable equipment in that we have a PERP permit for each of our units. Are we going to be required to report hours of use or fuel throughput as well?</p>
Todd Tamura	11:11:01 AM	<p>What is the schedule for the new CTR emissions inventory guidelines that will be superseding District ones?</p>
Pamela Vanderbilt	11:11:47 AM	<p>From Pamela Vanderbilt/Jacobs: There is clearly a regulatory schedule for facilities to report their EICG/CTR inventory information to the air districts. Is there a comparable schedule for districts and/or ARB to review the submitted inventory information and return comments in a timely fashion, so that future data collection and reporting approaches can be revised to better meet regulations and guidance? An example would be commonly acknowledged 180-day</p>

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		limit for agency completeness review for NSR permitting actions.
Bill LaMarr	11:12:01 AM	AB-617 requires real emissions reductions. Does CARB have some idea when they can announce the reductions achieved from the effort expended by facility owner-operators in compliance with the EICG and CTR regs. In short, when will we know the cost-benefit of these two regulations?
Amy Kyle	11:12:41 AM	But the CTR only brings in permitted facilities so it already incorporates the variability in district actions and does not correct for them. The consistency is only among those that are required to report but does not correct for what is already excluded. I agree with the staff comments that some good changes are being made but the fundamental structural issue here remains and contributes to inequities. Thank you. Amy D Kyle
Scott Cohen	11:12:48 AM	Regarding mobile sources inclusion in the toxics emissions inventory. I observe that this is a change from past policy (1987 memo I believe). Please clarify whether CARB believes this is a change from past policy on the matter, how this difference will affect comparison of past risk levels to future risk levels, the kinds of facilities that CARB believes will be most affected, rationale for inclusion of mobile sources, and how CARB will ensure that these sources are reported uniformly among the various affected industries and air districts.
Brandon Chang	11:13:27 AM	Question regarding unpermitted processes. CTR says unpermitted processes and devices at the facility, including unpermitted fugitive emissions, if at the beginning of the data year such facility specific emissions are required by local air district to be reported. Does this mean that facilities only need to report toxics for unpermitted processes when AB2588 comes up (every 4 years)?
Scott Cohen	11:14:32 AM	Please explain why gas stations would have low costs when they have automobiles to add to their inventory which is a complicated and new source.
Steven Yang	11:14:44 AM	why did CARB not consider availability of quantification methods to be a criterion for listing a chemical in A-1? why are facilities, instead of CARB, expected to determine if such methods to exist?

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Thomas Maulhardt	11:18:08 AM	Wildfires have had an enormous negative impact on air quality in California this year, and several other years in the recent past. Does CARB quantify air toxics from wildfires to put them in context with the emissions generated by regulated emitting activities? Does CARB regulate the emissions from controlled burning but not wildfire?
N Nagaraj	11:19:35 AM	Will you enable system to system transfers of data rather than manually entering data in the tool whichever one you plan on offering
Scott Cohen	11:27:37 AM	Of the 200 new chemicals, how many does CARB believe will be added to the lists of toxics emitted by combustion of common fuels (e.g., natural gas, gasoline, ULSD, jet fuel, etc.)?
Wunna Aung	11:28:58 AM	Is CARB okay with different toxic inventory reporting from the same process. Because, for example, San Joaquin APCD's toxic EFs may be different from South Coast AQMD's EFs. Ventura County APCD.
Richard Maddux	11:34:53 AM	Will SPARK and DOORS equipment be considered for inclusion?
Dioni Araza	11:37:47 AM	The data collected and reported by industries may be used to support claims that their emissions contribute to climate change. What are your thoughts on this? Dioni Araza at US Pipe
Noelle Cremers	11:42:39 AM	If a facility is under the threshold for all of its emissions, but brings on a portable diesel generator over 50 hp that requires reporting, is the facility then subject to any other emissions reporting even though the others are under the threshold? In other words, does the diesel engine thresholds bring a facility into the program and require reporting for all emissions? Noelle Cremers, Wine Institute
Carol Kaufman	11:45:46 AM	Carol Kaufman, Metropolitan Water District - If equipment is reported the initial year due to exceeding the thresholds, would reporting be required automatically during the next round even if the threshold is not passed for that second reporting timeframe?
Sharon Shearer	11:48:51 AM	Sharon Shearer (Martinez Refining Company): This is a follow-up question regarding the PERP engine requirement. Doesn't CARB have the best information regarding PERP engines? It is my understanding that most Air Districts do not track the location of PERP engine usage, so I don't see how they could identify potential exposure issues. Wouldn't it make more sense to get a complete picture of emissions and

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		locations from the PERP program, rather than present a small subset of those emissions? It is obviously better to get data from the source owner, operator, and permit holder, then to have a subset of facilities or Air Districts attempt to develop an emission estimate based on secondhand information. Why can't CARB and the source owners provide this information to the public?
Todd Tamura	11:54:15 AM	I have looked at the ISOR as suggested; however, it does not have the detailed info used to generate the regulation. Although those reports may be non-regulatory, they are the basis for the regulation and should be made publicly available (well before the Board hearing)
John Lane	11:57:19 AM	"Question 2: This started as a 15-day comment period and now pushed to 45 day. The rule making for PERP and diesel regulations took several years to allow for proper development. These proposals are equally complicated and have the potential to have significant impacts to communities and business. Why is this being rushed? Wouldn't the diesel and PERP rule making processes be a good model?"
Lauren De Valencia	12:02:04 PM	Where will this webinar recording be posted?
Todd Tamura	12:27:11 PM	I was not asking about when facilities are subject, I was asking when CTR emissions inventory methods were getting developed by.
Edward Krisnadi	12:32:01 PM	For the facilities required to report under CTR, the 1st year, which 2019 data, was reporting the data "business as usual". Are there any changes for the 2020 data (reported in 2021)?