

Joint Workshop:

Informal Discussion of Proposed 15-Day Changes to Amendments to the Air Toxics "Hot Spots" EICG Regulation and the CTR Regulation

Submitted Written Questions & Comments Log

Webinar Date: February 11, 2021

Webinar Recording: <https://attendee.gotowebinar.com/recording/6467509226942070800>

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 that were 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
Alison Torres	10:11:46 AM	Alison Torres- Eastern Municipal Water District - I'd like to clarify the threshold changes. Are the threshold adjustments from 4 tpy to 10 tpy only applicable to District Group B?
Noelle Cremers	10:12:07 AM	Can you restate the changes for composting? It sounds like it will no longer apply to facilities processing under 500 tons annually, but I didn't catch what was stated about the 24-hour holding threshold. Thanks, Noelle Cremers - Wine Institute
Amanda Orth	10:16:52 AM	I'm from the industry sector. The facilities subject to GHG reporting were phased in during the 2019 reporting year. Will the GHG reporters be required to complete annual reports starting this year for 2020 data, or will annual reports start in 2026/2028 depending on District Group? The rule is a little unclear.
Anne McQueen	10:16:54 AM	Does "only if a health value exists" mean only a health value listed by OEHHA? Does Phase 2 on slide 12 mean the same as ChemSet-22 on that slide? Anne McQueen Yorke Engineering
Barry Gershenson	10:20:56 AM	What are the law changes that affect the Dry-cleaning Industry? Barry Gershenson-California Cleaners Association.
Kyle Amy	10:21:31 AM	The Board has committed to moving to address disproportionate impacts and equity in its programs. It seems that your action to consider cumulative impacts and community scale effects as optional is contrary to the direction from the Board. Are you going to take this back to the Board?
Janet Dietzkamei	10:22:35 AM	Why is open burning excluded from CTR? What is accomplished by excluding open burning? CVAQ member.
Bill LaMarr	10:23:27 AM	What is the advantage/disadvantage of submitting comments during the "informal period" or the "formal period?"
Hao Quinn	10:24:16 AM	Clarification for threshold for stack parameter reporting.
Kevin Hamilton	10:24:18 AM	Please expand on the decision to remove open burning from CTR.

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Frank Caponi	10:24:48 AM	The 24-hour holding time threshold for recycling facilities is for "materials". We assume this means degradable materials, such as organics. Recycling facilities routinely bale items like nondegradable cardboard and store for longer periods on site.
Kim Burns	10:24:52 AM	Question on Phase 3B timeline. Particularly for composting and wastewater. Will only facilities with NAICS designation correlating to these industries be required to collect the updated data? Will the EFs be used for other facilities (muni waster used for industrial water). As I understand it, the updated EFs will need to be reflected in CY 2028 reporting. Thanks. Kim Burns E&J Gallo Winery
Tracy Goss	10:25:28 AM	So, for chem-set 2, if there is not health value for AB 2588, then no need to report under CTR? What about chem-set 1?
Alison Torres	10:25:34 AM	Alison Torres- Eastern Municipal Water District - The change noted in the slides stating that only Chemset-2 substances with health values require reporting under CTR. Does this include Chemset-2 substances with provisional health values?
Jeff Sickenger	10:26:03 AM	Can CARB clarify what additional guidance it intends to develop to implement the new provisions in both regulations?
Janet Dietzkamei	10:27:30 AM	Janet from CVAQ: How do the extensions improve/lower pollutants? Our goal is to reduce pollutants. Improve health for all residents.
Kim Burns	10:28:11 AM	Did I understand that organic material stockpiled on site but not composted would be subject to additional reporting requirements (follow up to Noelle's comment) Thanks.
Kyle Amy	10:29:03 AM	Moving substances and classes to ChemSet 1 and 2 moves reporting back in time (further in the future). Isn't this going to make the lists out of date before they are implemented? Have you considered the rate of change in chemicals when developing the phase in here? The implementation seems very protracted, so any emission reductions would be a decade away.
Amy Roberts	10:29:31 AM	What is CARB's rationale for keeping the 4 tpy threshold for Group A instead of further harmonizing with the EICG and CTR Group B 10 tpy threshold level? (SMAQMD)
Todd Tamura	10:30:18 AM	Did I hear correctly that ARB is expecting regulated sources to research which "reputable" agencies may have generated quantitative risk information for the various toxics?

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Kevin Hamilton	10:31:57 AM	This change: Adding ChemSet-2 chemicals to be reported annually under CTR – only if a health value exists. Is very concerning. As there are new chemical substances being developed as industry advances, is there a concern some of those new substances be missed if they are not reported?
Kim Burns	10:32:28 AM	Can you speak more about updated requirements for reporting dust on roads and their corresponding emissions and plans/requirements for updated emission factors? This would also include understand using the TSP rather than PM 10 fraction for particulates. Thanks.
David Rothbart	10:33:37 AM	For the CTR, what would need to be reported for a waste facility prior to 2028, if an emergency diesel generator exceeds the applicability threshold? In other words, would waste process emissions need to be reported in addition to those emitted from the emergency generator? David Rothbart with SCAP.
Steven Yang	10:35:36 AM	Steven Yang (Chevron). Concerning the existence of health values: 1) would this include OEHHA provisional values? 2) is the requirement to have health values for carcinogenic, acute, AND chronic health effects? something short of all three? or something altogether different?
Charlotte Nesbit	10:36:09 AM	Charlotte Nesbit , LACSD-can you go over the reporting obligation of portable engines?
Kiersten Melville	10:36:25 AM	Can you clarify the changes to portable diesel engine reporting?
Hao Quinn	10:38:24 AM	Hao - please clarify the threshold requiring stack parameter reporting.
John Henkelman	10:38:49 AM	What are the plans for changes in the reporting and inventory infrastructure (e.g. CEIDARS, online tools), and what is the timeline for any changes?
Kyle Amy	10:40:20 AM	During the Board hearing there were some specific comments made saying that deferring reporting for compounds solely because there is no "health value" was, essentially, bogus. So why did you put this in here? You could also decide to get health values done in a timely way. Your proposed approach shifts the health burden on the people who are exposed in the meantime.
Hao Jiang	10:40:21 AM	This is Hao Jiang from Disneyland in Anaheim. With understanding the guidance will address this, what is ARB's initial thought on excluding on-site mobile equipment from the CTR and EICG reporting?

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Steven Yang	10:41:44 AM	Steven Yang (Chevron). Will CARB require reporting of data elements that Districts impose, which are more stringent than CTR/ECIG? If so, would this impair the ability to compare emissions across the state?
Kim Burns	10:44:42 AM	What I am asking is the requirement to do the source testing or concern of other EFs be translated to other similar industries (would there be a transfer of the EF work from NAICS source testing to other similar facilities)
Kim Burns	10:45:49 AM	If not a NAICS for compost and wastewater (ancillary activities for industry), will additional source testing by the facility be required or will the work of the NAICS be transferred to other industries?
Seong Kim	10:47:24 AM	Song Kim - MBARD 1) If a facility does not have a Permit to Operate from an Air District, but reports GHG emissions. This facility is not subject to the CTR correct?
Kevin Williams	10:47:52 AM	Kevin Williams, SMAQMD: Will CARB publish a list of Chem Set 2 chemicals that have health values?
John Stagnaro	10:50:18 AM	John Stagnaro (San Joaquin Valley APCD): The proposed 15-day changes indicated that Table A-3 facilities do not need to report stack parameters, but did not include >4ton facilities that are not in Table A-3 in that allowance. I believe David said earlier in this Q&A that >4ton facilities that are not in Table A-3 will not need to report stack parameters either. Will that allowance be made explicit in the final regulation?
David Rothbart	10:51:39 AM	How is the regulated community able to determine what compounds have published health values? It appears that this approach is a moving target and might be challenging to address for those performing a statewide pooled study. As we have discussed, the wastewater sector would like to perform one study rather than needing to update such a study on a regular basis. David Rothbart (SCAP)
Natasha Meskal	10:56:02 AM	Can you please add the CAS# in Appendix C to all chemicals listed?
Neal Davenport	10:58:17 AM	Neal Davenport - can you comment on CARB's current status to create a new uniform emission reporting system (i.e., replacement to CEIDARS)?

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Seong Kim	11:01:06 AM	Song Kim - MBARD 1) Could you please point to me in the CTR regulation that requires the facility to report all the data in a HARP transaction file? If no such language exists, does that mean a facility can directly submit to CARB all the reporting requirement in either a "word" or "excel" document and be in compliance?
Kevin Williams	11:07:50 AM	Kevin Williams, SMAQMD: in CTR, how will districts know whether a facility exceeds 4 tpy of actual emissions without having all report, at least the first time? Or will we leave it up to facilities to determine whether CTR applies to them?
Kim Burns	11:09:11 AM	Back to dust on roads: Will additional source testing from a facility be required? Or simply use the existing EFs for unpaved roads and modify using the TSP contribution? Thanks.
Ann Verwiel	11:10:16 AM	Follow-up on metals question - I understand the idea of finding the full universe of metals in particulate emissions. But when running a source test, typically a particulate size fraction is used (TSP, PM10, PM2.5). When you say all particulates are you referring to TSP? If so, that is very different from what may be released beyond the facility boundary and be inhaled. When does the proportion that could actually be inhaled come into play.
Todd Tamura	11:12:46 AM	It appears that this may be in the existing rule rather than the 15-day amendments, but I would like to get clarification anyway: in Appendix D, item #4 seems to indicate that everyone with a diesel--except the institutional/emergency units listed--is required to do a stack test for PAH, formaldehyde, and diesel PM, is that accurate? Is that even possible, given the number of diesels and the number of qualified stack testers?
Kyle Amy	11:12:51 AM	Given the many years it will take to implement full reporting and then probably years after that to develop methods to accurately characterize emissions, are you considering any efforts to identify key sectors now? All the work that has gone into identifying the industrial codes of concern and the chemicals that may be emitted could be used to identify sectors of concern that might be evaluated for emission reductions or zero discharge without waiting the decade or more that it is going to take to get good data from the CTR inventory. This could give us a better basis to work on better control technologies or zero emission strategies now. Or is somebody else working on this?

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Todd Tamura	11:16:00 AM	And as a follow-up: if that testing IS required, who is responsible for doing the tests on the PERPs, the PERP owners or the facilities that sometimes use the PERPs?
Adam Harper	11:16:11 AM	Are the preliminary modifications to the CTR Rule posted online? I see the EICG documents.
Natasha Meskal	11:16:39 AM	Could you please clarify for Appendix E, Table E-3., Process or activity: Metal plating, anodizing, or grinding using cadmium or chromium: This includes any facility type that "preforms grinding using cadmium or chromium": is the meaning of this if grinding wheel contains cadmium or chromium, or if material grinded, including any coating on material, contains cadmium or chromium, or both?
Kyle Amy	11:32:27 AM	You don't need to read this but it is essential to have the CAS numbers for everything in some form.
Natasha Meskal	11:36:04 AM	Natasha Meskal Ecotek: Could you please post a link in Q&A of Chem2 chemicals with health values available?
Todd Tamura	11:42:40 AM	"Large-scale" is a good modifier - what is "large-scale" defined as?
Todd Tamura	11:45:19 AM	I didn't hear Beth answer either of my questions re diesel PM source testing. My understanding is that IX.C. still allows "alternatives to required stack testing" but it would be very helpful if ARB could identify what alternatives are acceptable
Todd Tamura	11:50:31 AM	(The "large-scale" language is what Beth used in responding to my earlier comment)
Todd Tamura	11:51:16 AM	My question is not about reporting, it's about testing
Todd Tamura	11:53:34 AM	So for EICG, what I heard Beth say is that the emission factors will be determined by individual Districts, rather than having a consistent method statewide? Is that right? I agree with what John said for criteria pollutants, but the EICG requirements are for HAP where there typically aren't engine-specific factors
Todd Tamura	11:55:36 AM	Meaning that there are different tiers of engines and published TAC data are largely for Tier 0/Tier 1 engines