

# CTR Fact Sheet

The following lists summarize what implementation of CARB's Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR) does and does not do. These lists apply to both current CTR requirements, and the requirements described in the amendments to the regulation that will take effect on January 1, 2022.<sup>1</sup> CTR does not exempt facilities from local air district rules and regulations that may have more stringent or additional reporting requirements.

## 1 CTR Does

- Require annual reporting of criteria pollutant and air toxics emissions from most permitted facilities in California, however the requirements are phased in for various facility types over several years, and the phase-in period includes additional time to evaluate progress and address issues.
  - For example, the phase-in period includes a "gap year" (2023), during which no new facilities are required to be added to the inventory.
- Require either the owner or the operator of a facility (as defined in the regulation) to provide either the calculated emissions, or the activity data needed to quantify emissions, for permitted devices and processes, if the facility meets any of the applicability criteria; generally, the person or entity listed on the district permit (the "operator," including those that rent or lease space from the landowner) will provide the necessary data. \*
- Rely on air districts to continue to collect and process the emissions data and report that data to CARB on behalf of the facilities (as is currently done); however, if air districts are not able to collect and report the emissions data to CARB, CARB has the authority to collect data directly from facilities (and to issue financial penalties to facilities, if the facilities do not provide the data).
- Identify the specific facility types, by industry sector or emissions source, and in some cases activity level, that are required to report emissions under CTR, and phases them into the reporting program over multiple years.
  - Gradually increase the number of facilities required to report annual facility-level emissions to include nearly all permitted facilities statewide (about 65,000 facilities).
- Establish uniform dates for when emissions reports must be submitted to the districts and when that data must be provided to the state.

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<sup>1</sup> Unlike the official published regulation, this document does not have the force of law, does not establish or modify requirements, and in no way supplants, replaces, or amends any of the legal requirements of the CTR. Conversely, an omission or truncation of regulatory requirements in this document does not relieve operators of their legal obligation to fully comply with all requirements of CTR.

- Increase the number of toxic chemicals to be reported by providing specific chemical lists; the chemical lists are the same as those required under the AB 2588 Hot Spots reporting requirements.
- Establish simplified, abbreviated reporting requirements for some smaller facilities that encompass about 40 to 50 percent of all facilities required to report, e.g., retail sale of gasoline and emergency backup generators.
- Work in tandem with other emissions reporting regulations (e.g., Hot Spots) so that a single emissions report will comply with all facility emissions reporting requirements.
- Establish a consistent list of data to be reported (e.g., facility NAICS code, device name and ID number, permit ID number, etc.), as well as the emissions sources, that must be reported by facilities across all air districts.
- Require reporting of emissions estimates from portable diesel fueled equipment at specified large facilities. \*
- Require the use of “best available data and methods” to estimate emissions.

## 2 CTR Does Not

- CTR does not collect comprehensive statewide emissions data for all applicable facilities in the short-term.
  - Statewide implementation by industry sector and source type is phased-in over seven years to help manage workloads.
- CTR does not establish emission reduction requirements.
  - Rather, it collects the necessary data to inform emission reduction programs, so that emission mitigation actions can be taken appropriately, as needed.
- CTR does not currently establish prescribed uniform methods for estimating emissions data, but such methods will be developed and phased in over time.
- CTR does not collect data directly from sources (facilities continue to report data to their local air districts) – but CTR does allow the State to obtain the data directly from facilities, if districts are unable to compile and report the data to CARB.
- For abbreviated reporting, and in cases when an air district calculates emissions on behalf of a facility using activity data provided by the facility, the CTR does not require facilities to calculate their own emissions. The facility may report the activity or throughput data as directed by the district, and the district (or CARB) will quantify the emissions based on activity data on behalf of the facilities, using best available methods.\*
- CTR does not currently require reporting of emissions from on-site mobile sources (cars, trucks, etc.), however districts may collect, evaluate and report such emissions at their discretion, as part of their rules or policies for the Hot Spots regulation.
- With some exceptions, for example portable diesel engines, CTR does not require emissions reporting from non-permitted sources, which may include

field-application of pesticides, unpermitted fugitive dust, unpermitted use of cleaning products, etc.; however, air districts may collect, evaluate and report this data to CARB pursuant to their rules or policies for the Hot Spots regulation.\*

- CTR does not include requirements or guidance related to health risk assessment or the evaluation of health impacts from individual or cumulative emission sources; guidance and requirements for such risk assessment activities are provided in the Emissions Inventory Criteria and Guidelines document which pertains to implementation of the Hot Spots program.
- CTR does not establish requirements regarding the use of a specific data reporting tool, visualization of the emissions data, emissions trends forecasting, or providing a public data sharing mechanism.\*
  - However, CARB is developing improved tools to import, manage and display emissions data, separate from the CTR requirements.
- CTR does not eliminate or change existing guidance related to emissions reporting for the National Emissions Inventory (NEI).
- CTR does not eliminate the existing reporting programs of local air districts.

\* CTR allows air districts discretion in implementing the rule. Please see the regulatory text for more information.

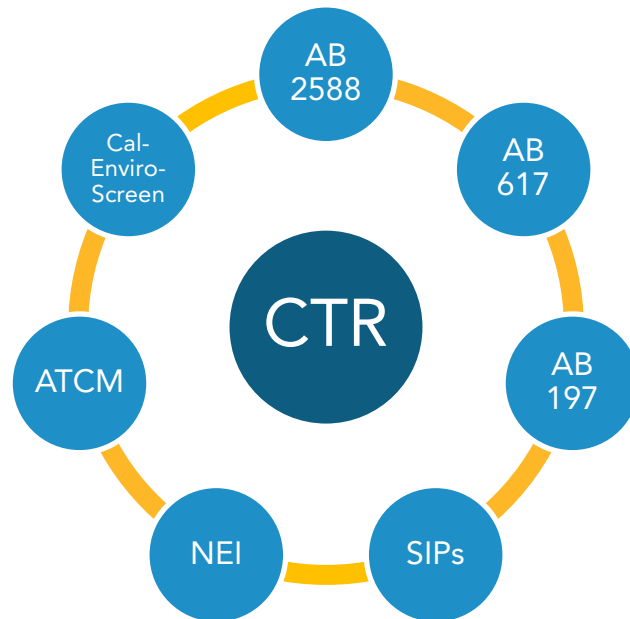
### 3 CTR Additional Information

Further information on CTR reporting for Data Years 2020-2021 available here: <https://ww2.arb.ca.gov/sites/default/files/2021-09/CTR-Guidance-for-Reporting-2020-2021-Data.pdf>

Please refer to Figure 1, below, for a visual representation of the role CTR plays with respect to other local, state, and national emission inventory programs.

Please contact CTR staff with any questions or help requests at: [ctr-report@arb.ca.gov](mailto:ctr-report@arb.ca.gov)

**Figure 1. The CARB CTR Regulation Aligns Several Stationary Source Emissions Inventory Reporting Programs**



The new CTR data will support:

- Community health (e.g., AB 617)
- Air Toxics Control Measures (ATCM)
- Public right-to-know (e.g., AB 197)
- Required and voluntary emission reductions
- Environmental justice
- Scientific research
- Health risk assessment (e.g., AB 2588, AB 1807, etc.)
- And more...