



March 29, 2019

Mr. Dave Edwards, Chief
Greenhouse Gas and Toxics Emissions Inventory Branch
California Air Resources Board
P.O. Box 2815
Sacramento, California 95814



RE: Comments on the Informal Draft 15-day Changes Regulations for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants

Dear Mr. Edwards,

On December 14, 2018, the California Air Resources Board (CARB) approved a new regulation for Criteria Air Pollutant and Toxic Air Contaminant Emissions Reporting pursuant to AB617. Below we have highlighted our main concerns over this amended regulation and the process in which it has taken place.

First, we would like to bring to CARB's attention that we were never notified by CARB that this amendment was being proposed by the Board. The community outreach that CARB asserts to have done, never reached our office. We were notified on March 7, 2019, by our local air district. In addition, the 15-day comment period does not give us, who have a small staff of environmental professionals, enough time to fully understand the implications this regulatory amendment will have both economically and administratively on our institution and comment appropriately. Based on the brief amount of time we have had to try to understand this amendment, and prepare a comment, we have summarized just a few of our concerns and issues with this regulation.

Currently, the University is required to report production data for our significant sources per the AB2588 program to our local air district. These sources are deemed as such by pre-existing processes that determine toxics and public risk. Our understanding is that this amendment would require the University to report insignificant sources as well. The vagueness in the amended regulation is worrisome. There is no clear provision to not include those insignificant sources which have little to no negative impacts on air quality. We fully support CARB's efforts to ensure the health of California residents, especially disproportionately affected communities, as stated for the primary reasoning for this amendment, however reporting on insignificant sources does nothing to achieve that goal.

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As it is our understanding from watching the workshop presentation on CARB's website, this regulation's purpose is to "harmonize statewide data submission requirements, reporting deadlines, frequency of report, and calculation methods" due to the varying methods used by individual air districts and to inventory all sources. We agree that processes for all air districts should be streamlined, but that should be done as an internal audit by CARB's administration and not placed on the permittees. If it is CARB's goal to inventory facilities, as is stated in the workshop presentation, the process in which that information is obtained could be done in a less financially and administratively burdensome way. This proposed regulation equates to an unfunded mandate.

We urge CARB not to finalize these rules until there has been notification to all businesses that this amendment effects and enough time for a realistic and thorough public review and comment.

Sincerely,



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