



Ventura County
Air Pollution
Control District

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Michael Villegas
Air Pollution Control Officer

March 29, 2019

Dave Edwards
Assistant Division Chief, Air Quality Planning and Science
California Air Resources Board
1001 I Street - P.O. Box 2815
Sacramento, CA 95814

RE: Comments on the proposed 15-day changes to the Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants

Dear Dave Edwards:

The Ventura County Air Pollution Control District (APCD) is submitting the following comments on the proposed 15-day changes to the Proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants.

1. Ventura County APCD staff believes the proposed changes do not qualify as “15-day changes”, specifically the reporting applicability requirements in Section 93401(a)(4)). The new changes are very significant and deviate significantly from the original proposal. They increase the number of affected sources in Ventura County to almost 1,100, most of which are small businesses that have never submitted any emissions or activity data to the District. The changes will put a significant burden on these small sources and the District. We recommend that CARB staff accept the original adopted rule and consider expanded reporting applicability as amendments to the original regulation.
2. There has not been proper notification and outreach to inform the many small businesses which could become subject to reporting requirements under the regulation.
3. Ventura County APCD does not have adequate resources necessary to implement such extensive and broad requirements. We also don't have an existing toxics inventory for affected facilities which in turn puts us in a difficult position to identify these facilities as well as compiling their toxic inventories.

Ventura County APCD appreciates the opportunity to provide comments on this important regulation. If you have any questions regarding our comments, please contact Planning, Rules and Incentives Division Manager Ali Ghasemi at 805-645-1427.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Villegas', written over a light blue horizontal line.

Michael Villegas
Air Pollution Control Officer