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**From:** Song Bai <>  
**Sent:** Thursday, March 5, 2020 2:54 PM  
**To:** Swanson, John@ARB <John.Swanson@arb.ca.gov>; Edwards, David@ARB <david.edwards@arb.ca.gov>  
**Cc:**  
**Subject:** [AB 617 CTR] BAAQMD comments on the Informal Review Draft of the CTR Regulation

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Dear John and Dave,

Thanks for hosting the CTR workshop in Oakland last month. We have reviewed the informal draft of the CTR regulation and here are our comments and questions. We are also reviewing the proposed CTR facility list and will provide comments/feedback separately. Thanks and look forward to your response!

Song

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93401 (Applicability)(a)(3) – “...categorized by the air district as high priority for toxic air contaminant emissions...”

Could CARB please clarify “high priority” and how it’s related to the “Elevated Priority Toxics” as specified in the proposed facility list? Are these high priority related to priority scores (e.g., greater than 10 or other metrics)?

93403 (Emission Reporting Requirements)(c)(2) – “If the request is approved by representatives of both CARB and the local district, the facility data report(s) may be directly submitted to the CARB system.”

Should this be strengthened to state “approved by both a representative of CARB and the Executive Officer (or someone given designated authority) of the local air district”? Our concern is

that a facility would contact someone (e.g. staff level in Engineering, Rule Development, Enforcement) at the local district who inadvertently approves the request.

93403 (Emission Reporting Requirements)(f)(1) – “...owner or operator at the time of a reporting deadline is responsible for submitting...”

A District facility ID may change (e.g., a new fac\_id is assigned) due to new ownership. Can CARB clarify how this ownership change may affect the determination of this submission responsibility? This is also related to what facility information and location to provide, per 93404 (a) (2)(A) – “...facility name and facility identification number established by the local air district.”

93404 (Emission Reports Contents)(b)(1)(B)2 – Process Description

What is CARB’s expected level of detail regarding “process description”?

93404 (Emission Reports Contents)(b)(1)(B)6 – “...activity levels for fuel use are to be reported in units of...”

Will CARB consider requiring just a single unit million of standard cubic feet (MMscf) for gases? Liquids and solids only have one single unit.

Table A-3

In the “NAICS Code(s)” column, Sector No. 2 has “3328xx”, Sector No. 7 has “332xxx”, and Sectors No. 9, 13, and 28 also has “332xxx”. Please clarify these codes for each sector should be mutually exclusive without any overlap (for threshold applicability).

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