

From: [Ma, Gary](#)
To: [ARB Clerk of the Board](#)
Cc: [Ma, Gary](#)
Subject: Comments on Board Item ctr2020: LLNL Comments On Proposed Amendments to the CTR Regulation
Date: Friday, November 13, 2020 11:44:44 AM

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Due to the docket system experiencing technical issues, I am emailing comments directly to the Clerk of the Board regarding Board Item ctr2020.

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Affiliation: Lawrence Livermore National Laboratory (LLNL)

Subject: LLNL Comments On Proposed Amendments to the CTR Regulation

Lawrence Livermore National Laboratory (LLNL) appreciates the opportunity to review and comment on the proposed amendments to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR Regulation) made available to the public on September 29, 2020.

LLNL notes extensive proposed amendments to the CTR Regulation. It will take some time for the regulated community and local air districts to comprehend the amended requirements and make changes to their operations to comply with the regulatory amendments. LLNL respectfully requests the CARB Board and CARB staff to consider amending §93403(a)(1)(A) to extend the “*Annual Emissions Reporting Using Existing District Program and Methods Phase-In Period*” by one calendar year. This would allow GHG and Criteria Facilities subject to reporting per §93401(a)(1) and (2), to report 2020 data in 2021 using existing local air district programs and methods. The regulated community is already late into collecting calendar year 2020 data. With all these changes to the CTR Regulation happening late in the year, it would be an extraordinary burden for GHG and Criteria Facilities – as well as the local air districts – to switch to a different reporting structure than the existing established local air district emissions reporting programs and methods for 2020 data reported in 2021. Without the additional phase-in period that LLNL is requesting, the potential for reporting errors by both the regulated community and the local air districts will likely be significant.

In addition, LLNL is concerned with the proposed requirements in §93404(c)(2)(C) – which adds new regulatory language requiring GHG and Criteria Facilities to report emissions from portable diesel-powered engines or devices rated at 50 maximum rated horsepower or above, regardless of equipment ownership or permit status. LLNL is capable of tracking and reporting LLNL-owned portable diesel engines used on the LLNL campus. However, it would pose an exceptional and unreasonable burden on institutions such as LLNL to track and report emissions from contractor-owned portable diesel engines. Contractor-owned portable diesel engines are primarily used on the LLNL campus to support contractor-led construction projects. LLNL respectfully suggests that the responsibility for such data collection be placed on the owners of the engines and devices.

LLNL appreciates your consideration of these comments. Please do not hesitate to contact me should you have any questions regarding these comments.

Sincerely,

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