

California Air Resources Board
Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (or CTR)
Draft Dated 9/30/2020

Dept. of Defense Comment Matrix
Submitted: 10 November 2020

#	Location			Navy Comment	Specific Requested Revision
	Page	Line	Section		
1			General	<p>The Department of Defense requests that ARB consider a bi-annual reporting requirement, instead of an annual requirement. Reporting biennially will be more practical and will allow facilities to focus on "ground-level" improvements to move the needle, such as updating equipment that will help California and the various air districts meet their air quality attainment goals.</p> <p>While we believe a bi-annual reporting requirement will benefit everyone, the impetus for our comment relates to unique features of military installations. Operations military installations do not tend to vary significantly from year to year, because major changes require advanced funding and planning across the large federal system. Therefore, emissions generally do not change significantly within a 12-month period. Reporting biennially would be more than sufficient to capture variations in emissions while requiring less resources – both financially and staff resources. Reporting biennially is also twice the current frequency under AB 2588, as such, substantially increasing the data and information that would be available to the public.</p> <p>Reporting biennially would meet the regulation’s intent while making it feasible for facilities to implement.</p>	
§ 93401. Applicability					
2	2		(a)(4)(A)	<p>The proposed facility actual emission threshold of 4 tons/year (tpy) for permitted equipment and processes is significantly lower than the threshold that the legislation had intended (i.e., 250 tpy). This threshold should be revisited; possibly raised; or a tiered threshold should be implemented.</p> <p>Consider annual reporting for greater than 20 tpy facilities and reporting less frequently for facilities with lower emissions and less impact. The frequency to be determined/approved by the APCD/AQMD on a case by case basis or based on an emissions threshold.</p>	.
§ 93403. Emission Reporting Requirements					

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3	15		New Proposed Subsection under § 93403. Emission Reporting Requirements	We request that CARB add a new sub-section into the Emission Reporting Requirements (§ 93403) to allow for remote facilities to report on a biannual basis and to eliminate required annual reporting for facilities that can demonstrate no significant change in operation over the reporting cycle.	<p>Create new sub-section under § 93403. Emission Reporting Requirements entitled “<i>Reduced Reporting for Remote Facilities or No Significant Changes in Operations:</i>”</p> <ol style="list-style-type: none"> 1. <i>Owners or operators of a GHG, Criteria, or Elevated Toxics Facility subject to reporting per sections 93401(a)(1), (2), or (3) which are remote facilities exceeding 1 mile from a receptor, shall submit Emission Reports on a biannual schedule.</i> 2. <i>Owners or operators of a GHG, Criteria, or Elevated Toxics Facility subject to reporting per sections 93401(a)(1), (2), or (3) which can certify and demonstrate no significant change in operations within that annual reporting cycle, is not subject to the annual emissions report requirement.</i>

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4	17		(c)(1)	We recommend adding wording to provide an opportunity for extending the reporting deadline by 30 days beyond May 1, if approved by CARB or the district as we are concerned about the lack of flexibility for reporting deadlines given the size of the equipment that we are required to report on.	(1) Submittal to the Local Air District. Owners and operators of a facility subject to this article must submit annual emissions reports to the local air district by May 1 of the year immediately following the data year, unless approved by the local air district and CARB to submit emissions reports directly to CARB as specified in 93403(c)(2). For one or more facilities, a local air district may specify a different submittal date which supersedes <i>extend</i> the May 1 submittal date <i>by 30 days</i> , if the district is able to provide the data to CARB no later than August 1 of the year following the data year. The local air district will determine the format in which the facility report contents are submitted to the district.
§ 93404. Emissions Report Contents					
5			(b)(1)(D)	This section requires emission release data reporting but is only necessary if an HRA threshold is triggered, resulting in unnecessary labor for CARB, air districts and facilities. Suggest that these reporting elements not be required unless specifically requested by local air district.	
6	36		Table A-2	Change designation of Imperial County from Group A (Large and Medium districts) to Group B (Rural and Mountain districts). Imperial County is a sparsely populated rural area that does not fit the definition of a Large or Medium District.	
7			Table A-3	CARB has indicated that if one piece of equipment triggers reporting, all of the facility's equipment and processes would be subject to reporting. Please clarify whether that is the case. If it currently the case, consider limiting reporting to the emission unit/process that exceeds the applicable threshold if not other rule applicability thresholds are exceeded.	

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8			Table A-3	<p>Emergency generator thresholds of hours/fuel used should be only for routine maintenance and testing to be consistent with AB 2588. In other words, emergency hours and emissions should not be included when comparing to the threshold.</p> <p>Emergency operation of standby generators are in response to natural or man-made disasters and are not time limited by permit condition.</p>	