



June 5<sup>th</sup>, 2019

Patrick Gaffney

California Air Resources Board

PO Box 2815

Sacramento, CA 95812

RE-OPOSITION: AB 617 Criteria Pollutant and Toxic Emissions Reporting

Dear Mr. Gaffney:

Granite Rock Company opposes the expansion of statewide reporting by the California Air Resources Board from the “major sources” identified specifically by the legislature in AB 617 to include practically all stationary sources within California. We do not believe such a program has benefit or improves impacted communities. In fact, this rule with existing flawed reporting systems and procedures will cause mass misinformation and like stress to the communities.

Graniterock is a 119 year old family-owned mining and construction company headquartered in Watsonville, California, with branch locations in Santa Cruz, San Benito, San Mateo, Santa Clara, Alameda, and Monterey counties. Graniterock supplies construction materials including ready-mix concrete, hot mix asphalt, building materials, landscaping supplies, rock, sand and gravel. The Company’s Construction Division is a significant regional heavy engineering contractor building roadways, airports and private commercial and residential projects.

For decades Graniterock has fostered exemplary environmental stewardship by building strong collaborative relationships with local agencies to better understand and address local concerns effectively, efficiently, and quickly. The expansion of statewide reporting identified in AB617 adds a burden to our local air districts that significantly impacts their ability to undertake critical activities such as permit modifications, variances, and other necessary activities that keep our operations running.

We are concerned with the significant misinformation to the community. We operate our business within 2 local air districts, the BAAQMD and MBARD and from experience, the quantification calculations, knowledge, resources, and methodologies are inconsistent, imprecise, and inequivalent. As a result, the data being reported will not only misinform the public but will delay the process for implementing proper, logical, and ethical processes to accurately model California’s statewide emissions.



The additional applicability of asphalt's zero activity level reporting threshold is not consistent with the intent of the policy and should be removed. Unlike many permitted processes listed with additional applicability, asphalt plants have no cancer risk if not operating. Therefore the activity level reporting threshold should be set above zero. Annual reporting for sources that are neither major stationary sources nor high risk in the state are not suitable for this high caliber annual reporting. Additionally, with the current state of AB617, there is no protection to asphalt production data to prevent abuse. This enables competitors to reverse engineer production data and take advantage of the market. We strongly encourage the board to limit the availability of data and remove the activity level threshold set for asphalt production.

The existing AB617 effectively allows for a process to fix what is broken in the system. By enabling fence line monitoring of stationary sources once 617 communities are identified, consistent and comparable data on emissions leaving the sites in the direct area of concern was authorized. This data could then be developed into a statewide standardized set of emission factors representative of comparable sites, allowing air districts and industries to work together and target the science behind emissions. Knowledge that is not currently present in the aggregate production industry. The targeted communities would allow for additional and crucial work to be done on a community to community basis without causing for data saturation that will become untenable. The proposed emissions reporting system creates an illusion of comprehensive emissions but instead creates critical data deficiencies that will defect the current mission of AB617 communities.

Graniterock believes it would be best to build an explicit reporting structure with clear and standardized emissions factors, a sound process, and a regulation that addresses oversaturation of data in a way that makes the information meaningful. We greatly appreciate the goals of AB617 and its targeted approach to reducing pollution in our most impacted communities. Graniterock fully commits to doing our best to quantify emissions through the most scientifically accurate methodology provided to us. We believe CARB is attempting to implement a statewide reporting system that falls out of the design structure due to the issues identified herein. We strongly recommend CARB revisit their mission statement, "To promote and protect public health and ecological resources through the effective and efficient reduction of air pollutants while recognizing and considering the effect on the economy of the state." In doing so, we believe you will find that the existing regulation best suits the intent of AB617.

Sincerely,

Ashlyn Wenger

Environmental Engineer

Granite Rock Company