



CALCIMA

**California Construction and
Industrial Materials Association**

August 1, 2019

Clerk of the Board
California Air Resources Board
1001 I street
Sacramento, CA 95814

**RE – *Support*: PROPOSED REGULATION FOR THE REPORTING OF CRITERIA AIR POLLUTANTS
AND TOXIC AIR CONTAMINANTS – Second Public Availability Draft July 17, 2019**

Dear Mr. Gaffney:

The California Construction and Industrial Materials Association (CALCIMA), and the California Asphalt Pavement Association (CalAPA) support the proposed statewide reporting by the California Air Resources Board as proposed for modification July 17, 2019 draft.

CALCIMA is the state trade association for aggregate, industrial mineral, and ready mix concrete producers in California. CALCIMA members provide the essential materials needed to build the state's public highways, roads, rail, and water infrastructure; to build homes, schools and hospitals; to grow crops and feed livestock; and to manufacture wallboard, roofing shingles, paint, glass, low-energy light bulbs, and battery technology for electric cars and windmills. CalAPA is a statewide trade association representing the asphalt pavement industry in California, including asphalt producers, refiners, paving contractors and other firms.

We are very appreciative of the Board's consideration of our previous comments on the scope of applicability of the rule along with the challenges of implementing statewide reporting across 35 different air districts, each with their own approach to permitting and inventorying of small sources. Returning the scope of the rule to the major sources identified in AB 617 is greatly appreciated.

We would like to make the following requests for clarification. We note in 93401(c) certifications are required to be sent by mail or e-mail. It would be desirable to have an e-certification similar to the SMARTS process the State Water Resource Control Board utilizes. Under the definition of Best Available

Data and Methods we believe reference to AP-42 should be included due to its prevalent utilization in inventory systems.

Again thank you for adjusting this regulation to the proper scope of applicability. We support the finalization of this regulation with the changes to applicability that have been made. We appreciate the opportunity to offer our comments and the careful consideration they were given by the California Air Resources Board staff.

Respectfully,

A handwritten signature in black ink, appearing to read "Russell W. Snyder", with a long horizontal flourish extending to the right.

Russell W. Snyder, CAE
Executive Director
CalAPA

A handwritten signature in blue ink, appearing to read "Adam Harper", with a long horizontal flourish extending to the right.

Adam Harper
Director of Policy Analysis
CalCIMA