



December 9, 2021

Chair Nora Vargas, County Supervisor
San Diego County Air Pollution Control District Governing Board

Via: APCDPublicComment@sdcounty.ca.gov

Re: Adoption of proposed amendments to Rule 19.3 – Emission Information- SUPPORT

Dear Chair Vargas:

The Environmental Health Coalition (EHC) expresses its overall support for Rule 19.3, which requires facilities in the San Diego region to provide the District with emission information. The Rule allows the District to quantify and inventory air pollutant emissions throughout the San Diego region by requiring permitted sources to submit emission information. This information is necessary for compliance with various federal and State regulations as well as for carrying out air quality and health risk modeling and simulation operations.

We agree that Rule 19.3 is outdated and are glad to see it being amended to comply with recent changes in State reporting regulations. Specifically, these amendments will comply with the California Air Resources Board (CARB) Criteria Toxics Reporting, or CTR Regulation, which implements statewide **annual reporting** of criteria air pollutant and toxic air contaminant emissions data from facilities.

The proposed amendments will also phase-in requirements for **electronic submittal** of annual emissions inventory reporting beginning in 2022, when electronic reporting will replace the current mode of emissions inventory reporting submitted via hardcopy. Additionally, the proposed amendments will address comments received from the U.S. Environmental Protection Agency (EPA) that require amendments to **allow for federal approval of the rule**.

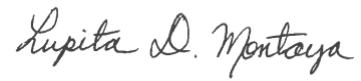
Proposed amendments will help improve air quality and public health

EHC agrees that annual reporting will enhance transparency and accountability for APCD enforcement and public information. Electronic submittal will facilitate the submission of emission information for subject facilities and will expedite the APCD's review and approval process. Both processes will support efforts to improve air quality and public health.

However, we would like to recommend that the APCD consider allowing for increases in the frequency of reporting to enable timely response to potential issues in a timeframe shorter than one year. This increased frequency, could be triggered only when there are issues of concern to the community that a facility has disclosed through its reporting or has been identified by APCD. Such reporting would allow the public to ascertain the due diligence exercised by facilities and build trust in our communities towards these facilities and APCD.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Lupita D. Montoya".

Lupita D. Montoya, PhD
Air Quality Advocate