

ARB Comments on  
Draft Report of the Expert Working Group on Environmental Health Surveillance  
Michael Benjamin, CARB PTSD  
Manager, Emission Inventory Systems Section

**1. Page 91, Paragraph 3:**

This paragraph misstates the sources of air pollution and leaves out some important details on the collection and uses of emission inventory data. We suggest replacing paragraph 3 with the following text:

“The ARB is responsible for maintaining the California Emission Inventory Development and Reporting System (CEIDARS) which collects information on point, areawide and mobile source emissions of criteria and toxic air pollution. CEIDARS data is used for the development of State Implementation Plans (SIPs), air dispersion modeling, setting new regulations, risk assessment, and development of emission trends. Emission inventory data in CEIDARS is obtained annually from local air pollution control districts, ARB emissions models, and local councils of government. The Caltrans Highway Performance Monitoring System provides data on traffic counts that is used by the ARB to model traffic-related air pollution. The ARB compiles emissions data from the various sources and checks it for errors. The ARB makes this data available for public use on the Internet and in a yearly Almanac of Air Quality and Emissions. {optional hyperlink to ARB Emission data web site: <http://www.arb.ca.gov/emisinv/emsmain/emsmain.htm>}

The ARB submits CEIDARS data yearly to the US EPA, which compiles it as part of its National Emission Inventory (NEI). Some facilities submit total emissions of hazardous air pollutants directly to the US EPA for the Toxic Release Inventory (TRI). Data provided by facilities to the TRI bypasses quality assurance checks by the local air districts and the ARB. As a result, facility data reported to TRI may differ from that reported to CEIDARS and the NEI. In addition, TRI data does not provide emission process and release details necessary for dispersion modeling. “

**2. Page 91, last paragraph, third sentence:**

It would be useful to note that the 280 air pollution monitoring stations are distributed in such a way that human population exposures are accurately measured. They are not evenly distributed geographically.

**3. Page 91, last paragraph, fourth sentence:**

Add “using photochemical dispersion models” after “..in these areas”.

**4. Page 92, first full paragraph:**

It should be noted that TRI data are facility total data only, and do not contain detailed process and emission release information that is necessary for dispersion modeling. TRI data is most useful as a cross check of CEIDARS toxics data.

**5. Page 92:**

A paragraph should be added describing the limitations of CEIDARS point source data. This is critical, because the ARB relies on local districts to provide all of this data. Some districts provide all requested data, and some do not. We suggest the following text:

“Some data elements that are critical for dispersion modeling and risk assessment are currently not well reported in CEIDARS. The completeness of these data elements varies from district to district and reflects individual district resources and priorities. To ensure consistent and reliable modeling, all air districts should populate these fields. Some of the data elements of particular concern are described below. In the CEIDARS database, some point sources do not have accurate facility or stack location coordinates. Some districts do not report all the stack parameters needed for dispersion modeling such as stack height and gas flow rate. Facility inventories should include emissions from all sources. Given that diesel particulate matter is the primary air pollutant risk driver, it is especially important for districts to provide complete and accurate diesel particulate matter inventories for facilities. Finally, although CEIDARS represents the toxic emissions of large sources reasonably well, it does not have data from small sources of toxic pollutants that are not required to report under the AB2588 Air Toxics “Hot Spots” Program. Although these sources may individually pose little risk, collectively they may add to an area’s cumulative risk significantly, especially if the facility emits potent toxic pollutants or if sensitive receptors are nearby. Since local air pollution control districts collect all point source emissions data, their cooperation is of critical importance. “

**6. Page 92, first recommendation:**

ARB and local air pollution control district budgetary constraints make field measurements and personal monitoring extremely unlikely so it probably should not even be suggested.

**7. Page 93, second recommendation from the top:**

We suggest changing “local agencies” to “local air pollution control districts”.