CCMEC

CALIFORNIA CEMENT MANUFACTURERS ENVIRONMENTAL COALITION
TXI Riverside Cement , Post Office Box 51479, Ontario, CA 91761-0079

November 19, 2007

Mr. Doug Thompson, Manager
Climate Change Reporting Section
California Air Resources Board
1001 I St.
P.O. Box 2815
Sacramento, CA 95812

California Cement Manufacturers Environmental Coalition
Comments On Proposed AB 32 Mandatory Reporting Regulations
Alternative Fuels

Dear Mr. Thompson:

The California Cement Manufacturers Environmental Coalition (CCMEC) is writing you on behalf of the manufacturers of Portland cement in California. Six companies operate 11 cement plants that produce more than 12 million tons of cement annually. California consumes and produces more cement than any other state in the country and annual state production supplies only sixty to seventy percent of the state's demand.

The Cement industry has been participating in the implementation of AB 32 with CARB, Cal EPA, Cal Trans, and others. Representatives of several companies have met with and provided comments to Ms. Dana Papke and others regarding the Cement sector reporting regulations. The Cement industry has found this interaction constructive and will hopefully lead to a workable reporting regulation. The industry has just a few more comments it wishes ARB to consider based on the document **"Staff Report: Initial Statement of Reasons for Rulemaking Public Hearing To Consider Mandatory Reporting Of Greenhouse Gas Emissions Pursuant To The California Global Warming Solutions Act Of 2006 (Assembly Bill 32)"** (i.e. Staff Report).

These comments have arisen from recently proposed Early Actions as described in the document **"Expanded List Of Early Action Measures To Reduce Greenhouse Gas Emissions In California Recommended For Board Consideration", October 2007,** which was approved October 25 by the ARB.

One of the proposed Early Action measures concerns Energy Efficiency at cement plants and a portion of that is the expanded use of Alternative Fuels which can have lower GHG emissions than conventional fossil fuels. The Cement industry supports the expanded use of alternative fuels such as biomass, tire derived fuel, biosolids, municipal solid waste, and others.

In order to accurately account for the benefits gained from the use of these fuels, appropriate emission factors, developed from either laboratory analyses or site-specific source tests with protocols approved by local Air Districts or ARB, are necessary. This is supported by Section III.A.1 of the Staff Report (page 28) which says "Emissions from alternative fuels would be estimated using measured heat content, measured carbon content, or with plant-specific emission factors measured from source tests approved by local air districts and/or ARB."

Considering the approach of developing fuel-specific emission factors by measuring heat value and/or carbon content of the fuel, the cement industry has identified specific laboratory methods to measure these values. Consequently, the following changes to the regulation language (identified in **bold underline**) are requested to incorporate these methods:

Heat Content

Section 95125(c)(1)(B)

Modify

> 2. For middle distillates and oil, **or liquid alternative fuels use,** ASTM D240-02 (2007) or ASTM D4809-00 (Reapproved 2005).

Add paragraphs

> **3. For wood pellets use, ISO 1928 or ASTM D5865-02**
>
> **4. For other solid alternative fuels including but not limited to biomass and wet and dried biosolids, use ASTM D5468-02 or D5865-02.**

Carbon Content – Solid Fuels

Section 95125(d)(1)(C)

Modify

When measured by the operator or fuel supplier, carbon content shall be determined using the following ASTM method:

For coal and coke: ASTM 5373-02 (Reapproved 2007) which is incorporated by reference herein.

For wood pellets: ASTM D-5373-02.

For solid alternative fuels including but not limited to biomass, and wet and dried biosolids: ASTM 5373-02.

Carbon Content – Liquid Fuels

Section 95125(d)(2)(B)

Modify

The carbon content shall be measured and recorded monthly. When measured by the operator or fuel supplier, carbon content shall be determined using the following ASTM methods: For petroleum-based liquid fuels, use ASTM D5291-02 "Standard Test Methods for Instrumental Determination of Carbon, Hydrogen, and Nitrogen in Petroleum Products and Lubricants", ultimate analysis of oil or computations based on ASTM D3238-95 (Re-approved 2005) and either ASTM D2502-04 or ASTM D2503-92 (Re-approved 2002), all incorporated by reference herein. **For liquid alternative fuels use, ASTM D5291-02.**

In some cases, a source test performed while the alternative fuel is being combusted may be more applicable. The regulation language found in Appendix A of the Staff Report includes section 95125(h)(3) which provides for the use of source tests to derive emission factors for biomass or solid waste fuels. The cement industry supports this approach and requests that it be allowed for all other alternative fuels as well.

Consequently, the following changes to the regulation language (identified as ~~strikethrough~~ and in **bold underline**) are requested:

Modify

Section 95110(d)(7)

> Alternative Fuels: Operators of cement plants that combust impregnated saw dust, solvents, plastics, waste oil, fossil-based wastes, tire-derived fuel, diaper waste, charcoal, and any other alternative fuel shall calculate CO2 emissions using the method provided in section 95125(c)**,** ~~or~~ section 95125(d)**, or section 95125(h)(3).**
>
> Section 95125(h) - ***Method for Calculating CO_2 Emissions from Combustion of Alternative Fuels, Biomass or Municipal Solid Waste.***
>
> Section 95125(h)(3) - Operators of facilities that combust **alternative fuels,** biomass-derived fuels, or municipal solid waste may elect to calculate CO2 emissions using ARB approved source specific emission factors derived from source tests conducted at least annually under the supervision of ARB or the local air pollution control district or air quality management district. Upon approval of a source test plan by ARB, the source test procedures in that plan shall be repeated in future years to update the source specific emission factors annually. In the absence of source specific emission factors approved by ARB, the operator shall use the default emission factors provided by ARB.

CALIFORNIA CEMENT MANUFACTURERS ENVIRONMENTAL COALITION
TXI Riverside Cement , Post Office Box 51479, Ontario, CA 91761-0079

We appreciate your consideration of our perspectives on these matters. We remain committed to working constructively with the California Air Resources Board and the California Environmental Protection Agency on AB 32 implementation, and to that end, would be delighted to address any questions you may have on the views conveyed herein.

Please contact Greg Knapp at (760) 245-5321 ext 319 or gknapp@txi.com to address any questions.

Gregory A. Knapp
Chairman PCA AB32 Task Force representing
California Cement Manufacturers Environmental Coalition