



December 4, 2007

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

**RE: Comments on Proposed AB32 Mandatory GHG Reporting Regulation,
October 19, 2007 (GHG2007)**

Dear Mr. Thompson:

The National Lime Association (NLA) is pleased to present comments on the proposed AB32 Mandatory GHG Reporting Regulation. NLA is the trade association for manufacturers of calcium oxide and calcium hydroxide, collectively referred to as "lime."

Under the proposed regulation, a general stationary combustion (GCS) facility that uses alternative fuels would not have the option of reporting its GHG emissions based on a calculation of the fuel's heat content (and other parameters), but instead would have to use a CEM. However, based on discussions with Rajinder Sahota of the California Air Resources Board (ARB), future versions of the regulation will allow reporting based on calculated emissions.

For the five industries for which ARB has prescribed industry specific protocols, due to the large quantities of alternative fuels potentially used at such facilities (e.g., refineries), when calculating GHG emissions, the regulations require that the heat content of alternative fuels be *measured* – i.e., *default* heat values cannot be used. For GSC facilities, however, the quantity of alternative fuels used at such facilities is likely far lower. Therefore, default heat values should be allowed. However, if ARB determines that measuring the heat values of alternative fuels is warranted for GSC facilities, NLA recommends that the frequency be at most monthly.

We appreciate the opportunity to comment on the proposed regulations.

Very truly yours,

/s/

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