

**From:** Vigeland, Kelle [KVigelan@wm.com]  
**Sent:** Thursday, June 14, 2012 11:42 AM  
**To:** ARB Greenhouse Gas (GHG) Emissions Reporting  
**Subject:** Comment on Potential Changes to MRR

Please forgive my tardiness, but if you could consider the following as revisions are made to the MRR, it would be greatly appreciated.

Is there a reason that the divergence from the EPA aggregation limit of 250 MMBtu/hr is limited to cogeneration units/systems, and not extended to facilities that generate electricity from biomass fuel? The Wheelabrator Shasta plant has 3 boilers that have a common feed system, so there is no difference in fuel going to each of the boilers. The steam generated from the 3 boilers goes to a common header that then goes to the turbines for the electricity generation step. Steam generated by each boiler is measured, but electricity generation is only measured for all turbines combined, so apportioning electricity production to individual boilers is an academic exercise that does not necessarily reflect the functioning system. The boilers are identical units but are above the 250 MMBtu/hr EPA threshold (but EPA's rule does not apply to the facility because non-biogenic emissions are below 25,000 metric tons). Please consider further revising section 95112(b) to include the changes below shown in **bold text**. Without this language, facilities with larger multiple units that feed a common electrical generating system (i.e., a common header that then distributes steam to a single or multiple turbine/generators(s)) would need to apportion the required information between boilers needlessly.

*Information About Electricity Generating Units.* Notwithstanding any limitations in 40 CFR Parts 75 or 98, the operator of an electricity generating unit must include in the emissions data report the information listed in this paragraph. For aggregation of electricity generating units, the operator must that meet the applicable criteria in 40 CFR §98.36(c)(1)-(4), as modified by section 95115(h). For a cogeneration unit/system or electrical generating unit/system, the operator may aggregate all the units that are integrated into a cogeneration the system according to 40 CFR §98(c)(3), even if there are more than one gas billing meters serving the cogeneration system; or aggregate according to 40 CFR §98.36(c)(1), even if a unit has heat input capacity greater than 250 MMBtu/hr. the operator may elect to report the following information for a group of aggregated units consisting of Aggregation of electricity generating units is limited to only electricity generating units of the same type (e.g., all cogeneration units, all bigeneration units, or all generating units that are neither cogeneration or bigeneration in the grouping), except when 40 CFR 98.36(c)(2) applies to the grouping, ~~in lieu of separately reporting for each single unit.~~ Operators of geothermal facilities, hydrogen fuel cells, and renewable electricity generating units must follow paragraph (e), (f), or (g) of this section, whichever is applicable, instead of paragraph (b) of this section. For bottoming cycle cogeneration units, the operator is not required to report the data specified in section 95112(b)(4)-(6) except for any fuels combusted for supplemental firing as specified in section 95112(b)(7).

If you have questions or would like to discuss my comment, please do not hesitate to contact me. Contact information is given below.

Sincerely,  
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