

## **Comment 1 for Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) - 1st Workshop.**

First Name: Tom

Last Name: Fang

Email Address: tfang@lacsdsd.org

Affiliation: Los Angeles County Sanitation Districts

Subject: AB 1900 Comments (Oct. 12, 2022 Workshop)

Comment:

1. LACSD commends CARB, OEHHA, and CPUC for protecting human health with respect to the use of biomethane. We assert that distribution and use of biomethane via common carrier pipelines is an important avenue for complying with SB 1383 and the larger goal of decarbonizing the gas grid. We noted and appreciate the removal of benzene as a monitored constituent on account of it being significantly lower in biomethane compared with natural gas. We request CARB to consider requiring the shut-off of biomethane pipeline injection only when the overall risk of biomethane is greater than that of common carrier natural gas.

2. In reference to the proposed testing by biogas source (page 16 of the October 18 CARB AB 1900 Workshop presentation), please clarify which set of constituents is required to be monitored when biomethane is derived from a mixture of feedstocks such as in co-digestion of wastewater solids with food waste.

3. The existing SoCalGas Rule 45 Section K.5.b requires for testing to be performed by an independent certified third-party laboratory, but allows for the interconnector (biomethane producer) to conduct periodic testing if agreed to by the utility. We request that public agencies with laboratories certified by CARB, SCAQMD, or other certifying agencies be allowed to self-test (i.e., sample collection and analysis) as long as the laboratory is certified for the applicable test methods. Lastly, please clarify if the AB 1900 recommended test methods such as EPA Methods 29 & TO-15 and ASTM D8230-19 are indeed available for certification, and if so, by which agency. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-11-02 14:57:11

No Duplicates.

**Comment 2 for Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) - 1st Workshop.**

First Name: Margaret

Last Name: Laub

Email Address: margaret.laub@anaergia.com

Affiliation: Anaergia

Subject: Comments on AB1900 Proposed Biomethane Monitoring Recommendations Public Workshop, October  
Comment:

Thank you for your consideration of the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/2-Ab1900update2022-ws-VTRUPAZmBDJVIQFm.pdf](http://www.arb.ca.gov/lists/com-attach/2-Ab1900update2022-ws-VTRUPAZmBDJVIQFm.pdf)

Original File Name: Anaergia CARB AB 1900 Comments - 20221108.pdf

Date and Time Comment Was Submitted: 2022-11-04 12:47:44

No Duplicates.

**Comment 3 for Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) - 1st Workshop.**

First Name: Stephen  
Last Name: Rosenblum  
Email Address: poll@rosenblums.us  
Affiliation: Climate Action California

Subject: AB1900update2022-ws  
Comment:

Please accept the attached written comments on behalf of Climate Action California and 350 Humboldt. We look forward to your response. Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/4-Ab1900update2022-ws-WjkFYIYlBzYBKgdm.pdf](http://www.arb.ca.gov/lists/com-attach/4-Ab1900update2022-ws-WjkFYIYlBzYBKgdm.pdf)

Original File Name: CARB-AB1900.pdf

Date and Time Comment Was Submitted: 2022-11-08 09:44:33

No Duplicates.

**Comment 4 for Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) - 1st Workshop.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on Pipeline Biomethane Standards

Comment:

Attached please find BAC's comments on proposed changes to pipeline biomethane standards (second try).

Attachment: [www.arb.ca.gov/lists/com-attach/5-Ab1900update2022-ws-VTcFYlc1UFxQNQRr.pdf](http://www.arb.ca.gov/lists/com-attach/5-Ab1900update2022-ws-VTcFYlc1UFxQNQRr.pdf)

Original File Name: BAC Comments on Proposed Pipeline Biogas Standards.pdf

Date and Time Comment Was Submitted: 2022-11-08 11:04:44

No Duplicates.

**Comment 5 for Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) - 1st Workshop.**

First Name: Dana

Last Name: Adams

Email Address: dana@rngcoalition.com

Affiliation:

Subject: RNG Coalition Comments on AB 1900 Biomethane Monitoring Recommendations  
Comment:

Please see the attached document for RNG Coalition's comments on the AB 1900 Biomethane Monitoring Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/6-Ab1900update2022-ws-UmBVYVBgAmAANgU9.pdf](http://www.arb.ca.gov/lists/com-attach/6-Ab1900update2022-ws-UmBVYVBgAmAANgU9.pdf)

Original File Name: 221108 RNG Coalition Comments on AB 1900 Workshop.pdf

Date and Time Comment Was Submitted: 2022-11-08 13:29:00

No Duplicates.

**Comment 6 for Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) - 1st Workshop.**

First Name: Colby  
Last Name: Morrow  
Email Address: clmorrow@socalgas.com  
Affiliation: So Cal Gas, Southwest Gas Co., PG&E

Subject: subject of comment  
Comment:

Attached comment letter on behalf of SoCalGas, PG&E and Southwest Gas Corporation

Attachment: [www.arb.ca.gov/lists/com-attach/9-Ab1900update2022-ws-AWsAaVU9V2pSIAGl.pdf](http://www.arb.ca.gov/lists/com-attach/9-Ab1900update2022-ws-AWsAaVU9V2pSIAGl.pdf)

Original File Name: Joint-Utilities-AB1900 comment-letter-.pdf

Date and Time Comment Was Submitted: 2022-11-10 13:12:54

No Duplicates.

**Comment 7 for Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Bryson

Email Address: nicolebryson@alsglobal.com

Affiliation: ALS Global

Subject: subject of comment

Comment:

AB1900 Proposed Biomethane Monitoring Requirements - comments  
attached

Attachment: [www.arb.ca.gov/lists/com-attach/10-Ab1900update2022-ws-UTBVMVdnUjgHMQk5.pdf](http://www.arb.ca.gov/lists/com-attach/10-Ab1900update2022-ws-UTBVMVdnUjgHMQk5.pdf)

Original File Name: AB1900-alsglobal-comments.pdf

Date and Time Comment Was Submitted: 2022-11-10 13:12:54

No Duplicates.

**There are no comments posted to Comments associated with the AB1900 Proposed Biomethane Monitoring Recommendations (Ab1900update2022-ws) that were presented during the Workshop at this time.**