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Gabe Ruiz  
Manager, Toxics Inventory and Special Projects Section  
California Air Resources Board  
1001 "I" Street, Sacramento, CA 95814

**RE: Pacific Gas and Electric Formal Comments on Proposed Amendments to the Emissions Inventory Criteria and Guidelines (EICG) Regulation for the AB 2588 Air Toxics Program**

Dear Mr. Ruiz,

Pacific Gas and Electric (PG&E) appreciates the opportunity to provide formal comments on the Air Resources Board's (ARB) 15-day amendments to the AB2588 Emission Inventory Criteria and Guidelines (EICG) Regulation, which were released on March 30, 2021.

PG&E would like to acknowledge the formal amendments proposed by CARB in the recent revisions that are conducive to our operations, such as additional time for reporting for facilities in smaller air districts. These revisions proposed by CARB reflect some of the concerns that were raised by PG&E in prior comments on the AB2588 EICG Regulation. PG&E respectfully submits the following comments on the formal amendments, including requests for clarification in formal guidance.

1. Clarification on Emission-factor Development

As stated in PG&E's November 20, 2020 formal comment letter and the February 25, 2021 informal comment letter to CARB, Section IX in Appendix B of the proposed amendments notes that "best available methods and data" are to be used to arrive at accurate representations of air releases at a facility. PG&E requests clarification on how "best available" methods and data will be determined. Specifically, PG&E is looking to understand if CARB's expected mid-2021 implementation guidance will provide details on which approach will give the best available method, specifically detailing criteria indicating when source testing is the most appropriate method.

Additionally, PG&E would like to understand how the individual air districts will deal with source testing protocol backlogs, or how newly developed emissions quantification methods can be obtained. Specifically, we seek clarification on whether the development of emission estimation methods and factors will be tracked and processed by the local air districts.

PG&E recommends that CARB clearly specify the state and local Air District roles and responsibilities for determining the “best available” methods and data, and when those would apply.

## 2. Applicability Criteria

While PG&E appreciates the removal of the Sector No. 0 applicability criteria of 4 tpy from Appendix E, the majority of facilities below the existing 10 tpy criteria will still be subject to the amended Sector No. 8 criteria of 5 engine runtime hours per year. Current maintenance and testing requirements would result in inclusion of nearly every diesel engine in California for AB2588 reporting per the Sector No. 8 activity level reporting threshold. PG&E wants to reiterate that this amendment will impose substantial recordkeeping burden on PG&E and its operations.

## 3. Inconsistencies in Applicability Criteria Between AB2588 EICG and AB617 CTR

PG&E has several hundred facilities across Northern and Central California that are potentially subject to AB617 “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants” (CTR) Regulations, and are classified as both District Group A and District Group B. While PG&E appreciates that facilities above 4 tpy of criteria pollutants have been removed from the amended language of AB2588 and AB617 CTR (only if located in District Group B), these amendments create inconsistencies between the two regulations. In particular, District Group A facilities will have an additional recordkeeping burden due to multiple regulatory requirements.

## 4. Cost of Implementation

The Initial Statement of Reasons (ISOR) estimates an implementation cost per facility for the initial reporting year at \$560 to \$22,300 and annual reporting thereafter at \$300 to \$720. PG&E believes that these cost values are grossly understated. PG&E estimates that initial reporting for just the EICG would cost at least two- to three-times more than the values presented in the ISOR and that annual reporting, for the simplest of facilities, would roughly cost \$1,000 per facility thereafter.

Thank you for the opportunity to submit these comments on the proposed AB2588 EICG Regulation.

Sincerely,

Fariya Ali