



June 5, 2008

Mr. Doug Thompson
Climate Change Mandatory Reporting Section
California Air Resource Board
1001 I Street
Sacramento, CA 95812

RE: Mandatory Reporting of Greenhouse Gases Emissions Rule

Dear Mr. Thompson,

Thank you again for the opportunity to submit our comments regarding the current version of the Mandatory reporting Rule.

In addition to comments we previously submitted for your consideration, we would like to suggest the following, in the hope, to increase the ease of Rule implementation:

- 1) Please add "Short tone = tone typically used in US (equivalent to 2000 lbs) to conversion Table 1 in Appendix A.
- 2) General comment: the current default emission factors are typically offered in kg or g / BTU or mass/volume of the fuel and then formula has conversion factors to convert g or kilograms to metric tones of CO₂ or CO₂ equivalent. Please keep in mind that public in general is not very comfortable with the metric system. We would like to suggest the following in regards to combustion units and default emission factors: Instead of incorporating conversion factors to convert g or kilograms to metric tones of CO₂ or CO₂ equivalent, to modify the default emission factor tables to include the following columns:
 - a. "Source Emission factor" the same value as the one published in source document,
 - b. "Source Emission factor units" (if it is g/KJ you display g/KJ, if kg/L display kg/L) – allows for increased transparency, easy tracking and updates if necessary,

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Title V Permitting & Compliance
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SCAQMD Variances
Violation Responses
Fugitive Emissions Monitoring
Form R Reporting
Storm Water Compliance
Industrial Waste Water Compliance
Risk Management Plans
Hazardous Materials Management
Waste Management
Hazardous Waste Minimization
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- c. Formula used to convert “Source Emission factor” to “Emission Factor” in lbs/standardized fuel unit
- d. “Emission Factor” value in lbs/standardized fuel unit,
- e. “Emission Factor Unit” would specify lbs/standardized fuel unit
- f. Conversion factor to convert emissions in pounds to metric tonnes is already in table 1 and as long as the application will automatically convert lbs of emission to metric tonnes and/or metric tonnes– do we have to include it in every formula?
- g. Additional column for “Emission Factor (metric tonnes of GHG/ standardized fuel unit” for fast estimates would be very helpful, same as
- h. Column that would list in short source of the emission factor.

By slightly changing the current approach as described, in case the emission factors have to be updated – updates are done in one place and automatically affect the whole rule.

Consequently the reporting requirements should request the calculated emissions in pounds, tones (2000 lbs) and metric tones.

- 3) General comment for stationary combustion fuel units: we were very glad to see that this version of mandatory rule expects gaseous fuels usage in mmscf, but the liquid fuels are expected in gallons and solid typically in short tones. We would suggest the following standardized units for fuels:
- a. Gaseous: mmscf,
 - b. Liquid: 1000 gallons,
 - c. Solid: tons, and
 - d. And for energy in MMBTU.

For short tones maybe we could add 2000 lbs = short tone (2000 lbs). Gaseous are already same, only gallons would have to be changed to 1000 gallons.

There are few reasons why we are suggesting this:

- Most of the local Districts collect the fuel usage data in the proposed units – consequently I believe that big number of the facilities that will be subject to the rule already have tracking systems set up to track their usage in standardized units (your reporting system can still offer option to enter gallons that will be automatically converted to 1000 gallons before used in formula),
- If industry users consider consolidated recordkeeping and tracking or some local Districts consider the consolidated reporting of criteria, toxics and GHG (which I hope will become general movement with ARB as well in the future – I would be happy to provide a list of numerous advantages of that approach if requested) – it will allow for easier data transfer and minimize chances for conversion/data entry errors.

- And the main reason for suggesting these particulate standardized units is the fact that EPA FIRE (most commonly used compilation of default emission factors on national level) tends to offer default emission factors either in lbs/heating value or typically based on same units. Recently lot of work/improvements were done on FIRE, it already contains some GHG default emission factors that I would hope will soon be greatly expanded by GHG emission factors additions. Particular improvement/effort to collect more updated emission factor (or new emission factors) is reflected in new option, recently added, to accept source test data directly from facilities/local government via web application that will be periodically review by EPA and if acceptable – incorporate in FIRE.
- 4) Since expected unit for gaseous fuels was changed to mmscf, please update scf to mmscf in 95104(a)(9).
- 5) This comment is more related to Rule interpretation: **Please do not insist on device level (e.g. by permit number) reporting in mandatory rule.** Process level is good as long as it can be interpreted that similar enough devices (same type/fuel or material, calculation methodology and emission factors are the same) could be grouped together for GHG reporting purposes. Similar grouping is typically allowed in criteria and toxics world – previous EPA insistence on one release point was a problem, but new EIS system that will have to be used in 2009 for 2008 emissions will allow multiple release point – so there is no problem any more.

I do not see that insisting on device reporting (e.g. by permit number) would bring any value to GHG inventory, while on the other hand it could greatly increase set-up, data entry and maintenance due to revisions, consequently causing lots of errors and problems.

I would suggest that device reporting be allowed by web reporting system, similar to process reporting, but not imposed as mandatory as long as process level reporting goal is met. I think that for mandatory reporting on device level disadvantages outweigh advantages. Allowing reporting on the process level (grouping) as well as on the device level, would greatly streamline the reporting that usually translates into greater data accuracy.

The following suggestion is not for Mandatory Reporting Rule but for data collection application: It would be nice if the ARB could incorporate a feature that would allow for equipment groups to enter the ratio of throughput usage that can be specified by device (and if not provided - prorated evenly within equipment in the group). This would allow collection of sufficient data for data analysis (specific device emissions could be extracted). There are numerous advantages in this type of analysis for reporters as well as for Districts.

We have a number of additional comments on ARB reporting system that is in development, but since they are not directly related to the Rule, they will be submitted separately.

We hope that the ARB will soon consider the consolidation of GHG, criteria and toxic emissions reporting to streamline and improve the data quality for all three reporting program and moves toward common practice applied globally. We do understand current time constrains, and this is why we are submitting this suggestion for future Rule evaluation.

Thank you one more time for the opportunity to share our comments. Please do not hesitate to contact me at (714) 596-8836 x 304 if I could answer any question or provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Natasha Meskal". The signature is fluid and cursive, with the first name being more prominent.

Natasha Meskal

President