



September 22, 2011

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COMMENTS ON CARB'S SECOND ROUND OF PROPOSED AMENDMENTS TO THE REGULATION FOR THE MANDATORY REPORTING OF GREENHOUSE GAS EMISSIONS

Dear Clerk of the Board,

Central Contra Costa Sanitary District (CCCSD) is pleased to submit the following comments regarding the California Air Resources Board's (CARB's) second round of proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions released for 15-day review on September 12, 2011. CCCSD is an award-winning secondary wastewater treatment facility that collects and cleans an average of 45 million gallons of wastewater per day for approximately 462,000 residents and businesses in central Contra Costa County, California.

CCCSD supports CARB's efforts to align their greenhouse gas (GHG) mandatory reporting program with the federal GHG reporting requirements. However, there are three (3) major differences that exist between the federal and proposed CARB GHG reporting requirements. Consequently, CCCSD proposes comprehensive alignment of the CARB GHG reporting requirements with those at the federal level by the following:

1. USEPA excludes "carbon dioxide emissions from the combustion of biomass, but include[s] emissions of CH₄ and N₂O from biomass combustion" in the GHG emission calculation for comparison to the federal reporting threshold (40 CFR §98.2(b)(2)). As such, CARB should remove the inclusion of CO₂ from biomass combustion in the 10,000 metric ton reporting threshold as is proposed by §95101(b)(4);
2. USEPA explicitly exempts the GHG emissions from co-fired fossil fuel and biomass combustion for biomass fuels not listed in their Table C-1 and in units less than 250 mmBTU/hr per 40 CFR §98.33(c) and (e). As such, CARB should include a similar exemption for GHG emissions from co-fired biomass combustion under sections 95101(b), 95103(j), and 95115(e).

3. USEPA has a reporting threshold of 25,000 metric tons of CO₂e for facilities that are not specifically listed in their Tables A-3 and A-4 and have an aggregate maximum rated heat input capacity of 30 mmBTU/hr or greater (40 CFR §98.2(a)(3)). As such, CARB should replace the 10,000 metric ton reporting threshold proposed in §95101(b)(3) to 25,000 metric tons of CO₂e.

CCCSD appreciates the opportunity to comment on the second round of proposed amendments to the CARB Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Sincerely,



Margaret P. Orr, P.E.
Director of Plant Operations

Electronic Submittal:

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=ghg2010&comm_period=2

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File: 2011 GHG General File