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August 11, 2011

Clerk of the Board,
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: California Biomass Energy Alliance Comments on the treatment of biomass power in the Air Resources Board's Proposed Mandatory Reporting of Greenhouse Gas Emissions 15-day Language

Dear Clerk of the Board:

The California Biomass Energy Alliance (CBEA) is the trade organization of the 33 operating biomass power plants operating in California. CBEA speaks for the biomass industry in many areas that affect biomass-fueled electricity generation, and herein offers our comments on the modifications to the Mandatory Reporting of Greenhouse Gas Emissions regulation as it pertains to our industry.

CBEA greatly appreciates the responsiveness of the staff as it relates to calculating, reporting, and verifying emissions from biomass-derived fuels in Section 95103 (j). In particular, per our recommendation, staff has clarified language in this section and related others to distinguish reporting requirements for solid-fuel biomass and other biomass technologies. We understood the intent of the previous language and now the current 15-day language matches that intent and appropriately distinguishes the differences among biomass and biofuel technologies.

CBEA also supports the language staff added addressing other stakeholder concerns related to solid fuels, including forest-derived wood and wood waste. The language in 95103(j)(1) now requires users of solid biomass to report the mass of fuel consumed by fuel type, and end users of forest biomass would also report fuel supplier contact information. While this change increases the facilities administrative burden, the additional data that ARB would get from these tracking numbers is of true value to the assessment of the use of forest derived wastes and residues in a biomass power plant. For example, wood waste derived from a THP is addressed through the GHG emission analysis section. The permitting agency will have inventory data (plots on a 4 acre grid) on their forest lands, including dead, dead and down, understory, etc. From that an estimate will be made of the wood waste that will be generated for each harvest unit (tops, limbs, and understory) and how they will dispose of it (pile and burn or truck to a power plant) and do the carbon analysis accordingly. There is also additional post-harvest monitoring which helps

improve the methodology and formulas. If there are any deficiencies identified in these environmental reviews that would be the appropriate venue for any resolution.

CBEA respectfully requests two additional clarifications to Section 95103(j). There are problems with associating actual emissions to types of fuels received. As fuel is received it is put in fuel piles and blended. Fuel inventory may be anywhere from less than a month to several months. Fuel receipts will not necessarily align with fuel usage, even on an annual basis. In addition, emissions are calculated based on the requirements already outlined in this regulation (i.e., they are calculated on steam production together with boiler efficiency), not fuel use. Biomass facilities are already reporting fuel receipts by category as noted above. Requiring companies to associate emissions with fuel type has no bearing on anything of importance. We have previously suggested modification to address this issue and believe it an important change to the regulation.

Second, in Section § 95103 (j)(1) it would be of great value to clarify that fuel originating from a biomass facility's community drop-off program will be treated a little differently by each of the facilities. As you know community collection drop off fuel is purely urban and sources vary considerably. Sources can be a single tree stump from a backyard yard, residential green waste program or larger property owner doing fire safety fuel reduction on their land; construction waste, broken pallets from the local school district or from an entire local government entity. Vehicles transporting this wood waste vary in size also. Some facilities weigh the larger vehicles and some do not. Community drop off programs are important to the communities that are served and it would be a loss if these program were burdened with unnecessary tracking and verification requirements under the rule. We fully appreciate that is not staff's intent. Therefore it would be of great value to add a sentence as follows to alert a verifier that each facility will account for this fuel in a manner that best suits how they receive this category of urban wood waste.

When reporting solid waste, the reporting entity must separately report the mass, in short tons, of urban waste, agricultural waste, and municipal solid waste. *Estimating the amount of fuel from public community drop off can be done using standard industry practices.*

Thank you for considering this clarification to Section 95103(j) and (j)(1). The California biomass industry supports changes made related to specific fuel reporting in 95103(j)(1-3).

Sincerely,

A handwritten signature in black ink, reading "Julie Malinowski-Ball". The signature is fluid and cursive, with the first name "Julie" being the most prominent.

Julie Malinowski-Ball, Executive Director
California Biomass Energy Alliance