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March 30, 2010

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

Ladies and Gentlemen:

Subject: Comments on Regulation for the Management of High Global Warming  
Potential Refrigerants for Stationary Sources, Attachment A  
Proposed 15-Day Modifications

The Los Angeles Department of Water and Power (LADWP) submits the following  
comments for your consideration:

**Subsection 95388(b) (3), Page A-34**

This section requires the facility owner to report refrigerant purchases, use and disposal on a facility basis. However, in reality, the refrigerant can only be purchased by certified A/C technicians, and the A/C technician may use the same bottle of refrigerant to refill equipment at multiple facilities. Also, the A/C technician may collect used refrigerant from multiple facilities for recycling/disposal. This is the case for LADWP facilities which makes it infeasible to estimate the quantities of refrigerants purchased and disposed of on a facility basis.

*To address this concern, the LADWP proposes to assign the purchase, storage and shipping of all refrigerants to a single facility in order to accurately represent its corporate-level management of these functions, while the amount of refrigerant charged and recovered will be reported at each facility. Please clarify if this approach fully complies with the regulation.*

**Subsection 95385(g), Page A-24**

This section requires a leak check be conducted any time an oil residue is observed. However, an oil residue may remain from past repair or service if it was not cleaned-up at that time.

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*Please clarify the intent of this provision. We believe a leak inspection should only be required if the new oil residue is observed indicating a new leak. ARB may further clarify that an owner/operator may determine whether the oil residue is indicative of a new leak or not based on records maintained by the owner/operator.*

**Subsection 95397(e), Page A-48**

If a request for exemption is denied, this section allows an owner/operator the option to repair a leak within 14 days or prepare a retrofit/retirement plan within 30 days.

*Please clarify that a facility opting to prepare a retrofit/compliance plan will not be deemed in non-compliance during the 30 day period allowed for preparing the plan.*

LADWP appreciates the opportunity to submit these comments on the revised regulation.

If you have any questions or need additional information, please contact Mr. Bruce Moore at (213) 367-3772.

Sincerely,



Mark J. Sedlacek  
Director of Environmental Affairs

DP:rp  
c: Mr. Bruce M. Moore