



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

February 18, 2009

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

Re: Support for Regulation to Achieve Greenhouse Gas Emission Reductions from Semiconductor Operations

Dear Clerk of the Board:

Staff of the Bay Area Air Quality Management District (District) has reviewed your proposed Regulation to Reduce Greenhouse Gas Emission from Semiconductor Operations (CCR Title 17, Subchapter 10, Article 4, Subarticle 2, Sections 95320 to 95326).

This proposed regulation sets new emission standards for fluorinated gas at semiconductor manufacturing operations. Effective on January 1, 2010, it establishes standard emission calculation procedures, requires monthly and annual emissions reporting, and initial permit applications to be submitted by March 1, 2011. Air Districts will be required to enforce the regulation. The District is prepared to develop a plan for implementing and enforcing this regulation for affected facilities within our jurisdiction.

The District supports this regulation as proposed and believes that it will help reduce GHG emissions in California. We appreciate the opportunity to work together with ARB in developing this regulation. We will continue to work with ARB in achieving the goals of AB 32.

Sincerely yours,


Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

JPB: BFB: mcl

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

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