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California Air Resources Board
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FROM: Ted Vincent
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Date: June 7, 2019

RE: Comments on the Proposed Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting

The Energy Center San Francisco (ECSF) appreciates the opportunity to provide comments on Assembly Bill No. 617 to the California Air Resources Board. We are located at 460 Jessie Street in the South of Market area of San Francisco and we are subject to the reporting requirements of the Green House Gas (GHG) program. We emit approximately 60,000 tonnes per year of CO₂e however our emission of Toxic Air Contaminants (TACs) is very low. Since we have been included in AB 617 only due to our CO₂ emissions and not because of TACs, we respectfully request to be exempted from this program. The following outlines our reasons.

1. We are possibly the smallest utility regulated by the California Public Utility Commission and the only district energy heating system in California that is also large enough to be included in the GHG program and now in the AB 617 program. We have found that being unique is problematic when it comes to complying with some of the regulations in the GHG program and we expect this to be even worse with TACs reporting and monitoring.
2. Even though we emit a significant amount of CO₂, our emission of Criteria Air Pollutants (CAPs) and Toxic Air Contaminants (TACs) are very small. According to the BAAQMD, our total CAPs emissions are less the 28 tons per year and our emission of TACs are approximately 33 pounds per year or 0.016 tons per year. It hardly seems reasonable for a facility that emits almost no TACs to be subject to a TAC reduction program.
3. If we are required to conduct either ambient air monitoring or fence line monitoring, we would not be able to separate our emissions from the other sources in the area. Almost all of the TACs would come from mobile sources and smoke from cigarettes and marijuana. Our facility is approximately 150 feet by 150 feet and our stack is approximately 200 feet high. The City of San Francisco decide our neighborhood was a good place to locate dispensaries because there are no sensitive receptors and very few residents in the area.

4. Our facility has undergone significant air pollution abatement retrofits. Approximately 15 years ago, our facility was retrofit with a large flue gas scrubber primarily for heat recovery. In 2012 and 2013 we installed SCRs on half of the boilers to come into full compliance with BAAQMD regulations. The SCRs were prototype systems that utilized Urea (Diesel Exhaust Fluid or DEF) in boiler applications. Our initial source test gave emissions of 1/3 ppm NOx at 1 ppm ammonia slip. We very much over comply with the regulations for criterial air pollutants. Even now our annual average NOx is only 2 ppm. Other than the scrubber that most likely removes a significant amount of Formaldehyde, we may not be able to further reduce TACs cost effectively.

Assuming we are not allowed to be exempt from this program, we request that the reporting and compliance be simplified for minor sources of TACs. If we are required to report TACs, we would like to be allowed to a simplified reporting method such as reporting the value(s) calculated by the air district for our facility. The BAAQMD provides these numbers every year with our Permit to Operate. Since the air district develops these numbers, it should not be necessary to conduct an audit. We would also request that any cap and trade program be voluntary for sources that have less than a threshold amount such as 1 ton per year.

Thank you again for your consideration,

Ted Vincent
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