

City of



**Department of Public Utilities**

Wastewater Management Division  
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March 3, 2010

Mr. James Harader  
San Joaquin Valley Unified Air Pollution Control District  
4800 Enterprise Way  
Modesto, CA 95356-8717

RE: Comments on Best Performance Standards – Co-Generation Facilities

Dear Mr. Harader,

Thank you for the opportunity to provide comments regarding development of Best Performance Standards (BPS) for Co-generation facilities.

We have reviewed the documents from the District's website titled Climate Change Action Plan – Best Performance Standards for Stationary Sources.

We disagree with the District's developing approach to consider CO emissions as being equivalent to CO<sub>2</sub> for greenhouse gas purposes; and, the District's reasoning that, while CO is not a greenhouse gas, it is converted to CO<sub>2</sub> in the atmosphere.

We recommend excluding CO emissions because such an assessment is not needed to comply with AB32, and CO is not listed in that law. In addition, maintaining a simplified approach initially would be more beneficial at this stage of the development process.

Again, thank you for the opportunity to provide comments on this important issue. If you have any questions regarding this transmittal please contact me at (559) 621-5110, or [steve.hogg@fresno.gov](mailto:steve.hogg@fresno.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Hogg".

Stephen A. Hogg  
Assistant Director of Public Utilities, Wastewater