



July 18, 2014

Mr. Ali Ghasemi, P.E.  
Program Supervisor  
Office of Planning, Rule Development and Area Sources  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765

**Re: Comments on the New Annual Emissions Reporting (AER) Portal**

Dear Mr. Ghasemi:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates this opportunity to communicate our concerns about the significant changes to the AER portal. SCAP represents 81 public agencies that provide essential water supply and wastewater treatment to nearly 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as recycled water and renewable energy.

**Background**

SCAP appreciates the dialogue with you regarding the new AER reporting portal. While we welcome the 30-day extension proposed by SCAQMD staff, we remain concerned that our member agencies in the South Coast Air Basin may have difficulty with the initial implementation of the new system. Unless data entry is streamlined, some SCAP members that previously relied upon in-house resources will now be required to retain consultants to complete this year's AER, even with the 30 day extension.

Our members have reviewed your June 26<sup>th</sup> transmittal and have the following comments and recommendations we believe will further enhance the new AER reporting portal:

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## SCAP Comments & Recommendations

- **Unit level reporting on a permit-by-permit basis for both criteria and toxics emissions**

Repetitive reporting on a permit-by-permit basis will substantially increase the amount of staff time needed to complete the AER. While the “identical devices” feature discussed at the June 18<sup>th</sup> meeting will be helpful, we believe that a copy device feature could also significantly minimize duplicative data entry. Such a feature would allow the user to simply modify a few non-representative fields rather than manually input duplicative information (i.e., only a few of the many fields would need to be manually input for similar devices).

**Recommendation.** SCAP requests that a copy command be provided to reduce labor needed for manual data entry.

- **Default emission factors**

We would like to clarify that many SCAP members do not rely exclusively on default emission factors. Our members base their reporting on the most accurate information possible rather than default emission factors, which tend to be very conservative. In fact, the use of some default emission factors could result in an exceedance of SCAQMD’s rules and yield unrealistic health risks. Because facilities wish to minimize emission fees and provide accurate AB 2588 reports, many SCAP users tend to manually input device-specific emission factors. We anticipate that manually inputting emission factors will be rather time-consuming.

**Recommendation.** SCAQMD staff should provide a warning prompt regarding the use of default emission factors that could inadvertently cause a rule violation. Additionally, users called upon to perform a facility health risk under Rule 1402 should have flexibility to update emissions previously entered using SCAQMD’s default factors, if more accurate information is available in time for a requested health risk assessment. Finally, the requested copy feature described above would also minimize data entry for many repetitive emission factors.

- **Various-Location Equipment**

Please clarify when SCAQMD-permitted and unpermitted various location devices can be aggregated. Without aggregation, many various location devices would need to be entered as individual devices. Some SCAP members have numerous various location devices, such as portable scrubbers, blowers, engines, negative air machines, pressure washers and abrasive blasting units.

**Recommendation.** Various-location permitted equipment should be aggregated for categorically similar equipment regardless of size and throughput. For non-production operations, this approach would be much simpler and accommodate the extremely low cumulative emissions.

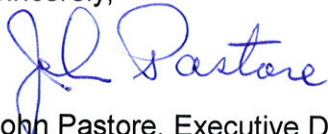
- **Technical Improvements**

The ability to import Excel spreadsheets and link to CARB and EPA’s e-GGRT GHG reporting portals would greatly streamline all reporting efforts since throughputs for many devices in the AERs are the same for other regulatory reports.

**Recommendation.** To reduce duplicative reporting efforts, SCAP recommends (1) including an Excel import feature, (2) providing a linking mechanism to export AER data to similarly structured reporting portals including ARB's HARP and CEIDARS, which would assist reporters who need to conduct Rule 1402 facility risk analyses, and (3) include an option to print GHG summary reports to help facilities comply with duplicative ARB and EPA reporting requirements.

Several of our members would like to meet with you at your convenience to discuss our remaining concerns. Your consideration of SCAP's comments and recommendations is greatly appreciated, and we look forward to working with you to implement a streamlined AER system. If you have any questions regarding this transmittal, please do not hesitate to contact Mr. David Rothbart of the Los Angeles County Sanitation Districts at (562) 908-4288, extension 2412.

Sincerely,



John Pastore, Executive Director

cc: Elaine Chang, SCAQMD  
Kris Flaig, Bureau of Sanitation, City of Los Angeles  
David Rothbart, Los Angeles County Sanitation Districts  
Randa AbuShaban, Orange County Sanitation District