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SENT VIA FAX (909) 396-3252

Mr. Martin Kay
Science and Technology Advancement
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

Subject: Comments on SCAQMD Proposed Amended Rule 1110.2

Dear Marty:

On behalf of Southern California Gas Company and San Diego Gas & Electric, I am providing you with comments on the January 2007 version of Proposed Amended Rule 1110.2. As you know, both the SoCalGas and SDG&E operate major source facilities located in the South Coast Air Quality Management District which are subject to RECLAIM regulations as well as and Federal Operating Permit (Title V) requirements. Collectively, these facilities have several pieces of equipment that are subject to the proposed rule.

We recognize the Districts need to propose several changes to the rule in light of the history of high levels of non-compliance observed in the field by District Compliance personnel. We also want to thank the District for allowing additional time for industry to collect data that helped identify the dynamic relationships between IC engines of diverse vintage, their emission control equipment and various air-to-fuel-ratio (AFR) controllers. That being said, we generally believe that the Districts proposal, in particular with respect to monitoring requirements, is still quite excessive and overshoots the compliance objective. In some cases, burdensome and costly monitoring requirements will be imposed without a significant or corresponding emissions benefit to the air basin. It is our hope that the District will seek to provide operators added flexibility to achieve compliance while taking cost and technical feasibility into consideration.

Our comments on the proposed rule amendment are hereby enclosed for your consideration. If you have any questions regarding this matter, please contact me at (213) 244-5476.

Sincerely,

Charles Humphrey, Jr.

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Enclosure

Attachment 1: Summary of Rule 1110.2 Comments

Cc: Laki Tisopulus (SCAQMD)
Howard Lange (SCAQMD)
Lee Wallace (SoCalGas/SDGE)
Steve Simons (SoCalGas)
Gregg Arney (SoCalGas)