



California Council for Environmental and Economic Balance

100 Spear Street, Suite 805, San Francisco, California 94105
415-512-7890 phone, 415-512-7897 fax, www.cceeb.org

March 2, 2012

VIA ELECTRONIC FILING

Mr. Brian Bateman
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

RE: Proposed Amendments to Regulation 2, Rules 1, 2, 4 & 6
Initial Comments

Dear Mr. Bateman:

CCEEB is a coalition of business, labor and public leaders that advances strategies for a strong economy and a healthy environment. Our members operate many different types of facilities in the District. We support the District's ongoing efforts to improve air quality and meet federal air quality standards. Our members have invested substantial amounts to comply with the District's emission control standards and have significantly reduced their emissions.

The District has proposed numerous changes to Regulation 2, Rules 1, 2, 4 & 6. The initial comment deadline was set for March 2, 2012. We requested and appreciate the District's willingness to extend the primary deadline to March 27, 2012. We expect to submit more extensive comments on the proposal by that deadline. We also are aware that the District has asked for our initial input on three key items by the original deadline. This letter addresses these points.

1. CCEEB supports the addition of a BACT requirement for PM_{2.5} at 10 lb/day.
2. CCEEB supports adding GHG permitting requirements at the 100,000 tpy CO₂e effective threshold under the EPA tailoring rule.
3. With regard to the District seeking a SIP-approved PSD permitting program, we agree directionally with this approach, but we do have concerns with the proposed calculation methods for determining applicability.

CCEEB appreciates the opportunity to comment on this proposal. Please feel free to contact me if you have any questions.

Sincerely,

William J. Quinn

cc: Mr. Jack Broadbent
Mr. Alexander Crockett
Mr. Gerald D. Secundy