



February 23, 2010

To: Derek Fukuda, San Joaquin Valley Air Pollution Control District

Fm: Rob Neenan, Vice President, Government Affairs

Re: GHG Best Performance Standards

---

The California League of Food Processors (CLFP) appreciates the opportunity to comment on the San Joaquin Valley Air Pollution Control District's Notice of Development regarding Best Performance Standards (BPS) for dryers and dehydrators. CLFP has several members with these types of equipment that may be affected by the standards developed by the District.

CLFP has several general comments for your consideration regarding Best Performance Standards:

- PUC quality natural gas is used by all commercial food processing dryer and dehydrator operations. Natural gas is the lowest carbon content fuel that is commercially available, and so the use of PUC quality gas should constitute BPS.
- Current dehydrator and dryer operations and maintenance plans should be documented and implemented. The industry knows how to operate these systems and have no financial incentive to use excessive amounts of natural gas and generate greenhouse gasses.
- Variable frequency drives, soft starts, and some other load limiting controls may be appropriate in specific equipment design specifications for dehydrators and other food processing stationary source equipment. However, every facility is unique and the District should not take a one size fits all approach.
- Vegetable dehydrators typically operate at low temperatures which are not adequate for most heat recovery systems such as boiler economizers. These systems should not be included as BPS.

CLFP encourages you to visit several types of facilities to obtain a good understanding of the equipment, operating procedures, and systems limitations, and would be glad to arrange meetings for you.