

Huff, Gwen

From: Patti Krebs [pattik@iea.sdcoxmail.com]
Sent: Wednesday, August 18, 2010 10:17 AM
To: Water Use Efficiency
Subject: U5 Process Water Comments
Attachments: U5 Process Water Comments 8_16_10.doc

Please see attached.

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August 16, 2010

VIA Email to Wue@water.ca.gov

Subject: U5 Process Water Comments

Thank you again for providing allowing stakeholder input into the development of the emergency regulation for calculating process water with the methodology for process water. We have comment in the following areas:

"For purposes of implementing this deduction, the following definitions apply":

Bullet 3 "Industrial water user" means a water user that is primarily involved in product manufacturing and processing activities, **such as**. Change the "**such as**" to "**Examples include**"

Bullet 5 "Process cooling water" is water that is used to cool machinery, buildings, or any other manufacturing cooling process, other than water which is used for incidental cooling uses.

We would like the bullet to read instead: "Process cooling water" is water that is used to cool machinery, buildings or any other manufacturing, technology or research and development cooling process, other than water which is used for incidental cooling uses.

We would also like to express serious concern that large industrial users require significant quantities of water for **air conditioning** to support their business processes. Industrial facilities require large amounts of air conditioning to satisfy laboratory and manufacturing environmental requirements and to address the heat loads produced by large quantities of technical equipment, freezers, refrigerators, lyophilizers, data servers, electronics, etc.

Efficient cooling of buildings containing these activities requires central air conditioning plants using cooling towers for evaporative cooling; chillers supply chilled water to air handlers via a closed loop and reject heat to cooling towers via an open loop. These plants are approximately twice as energy efficiency as any comparable air-cooled system, i.e., they are green from an

energy use/carbon generating standpoint. However, they do require significant amounts of water for the evaporative cooling. Since the capital cost of these plants is high, generally only large companies install them, but they do so because the return is in substantially lower energy bills and lower carbon emissions. Imposing significant penalties on water used for this purpose, "process cooling water" would diminish these savings and likely **discourage** companies from investing in these energy efficient, "green" cooling plants.

We would urge DWR to take into account these type of cooling systems for process water exemption under the process water example that "Process water can include cooling water."

Existing Industries:

Bullet 2 Delete bullet 2. Outside the scope of the regulation.

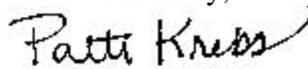
New and Retrofitted Industries:

Bullet 1 Delete bullet 1. Outside the scope of the regulation.

For consistency, the term "Process Cooling Water" is defined but when used later in the paragraph above the heading **Existing Industries**, it is referred to as "Cooling process water."

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Patti Krebs". The signature is written in a cursive, flowing style.

Patti Krebs,
Executive Director
Industrial Environmental Association