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From: Carolyn Lozo
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California Air Resources Board

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Section Chief, Community Health and Environmental Impacts Section
Office of Environmental Health Hazard Assessment

Date: April 24, 2023

Subject: RECOMMENDATIONS REGARDING UPDATING THE HEALTH PROTECTIVE
STANDARDS FOR THE INJECTION OF BIOMETHANE INTO THE COMMON
CARRIER PIPELINE

Attached are recommendations by the California Air Resources Board (CARB) for updating California's biomethane safety standards. The attached report supplements the Office of Health Hazard Assessment's (OEHHA) 2020 report, *AB 1900 Biogas Recommendations, Biogas Constituents of Concern and Health-Protective Levels for Biomethane*. These recommendations were developed in accordance with the provisions of Assembly Bill 1900 (AB 1900).

AB 1900, authored by Assemblyman Mike Gatto and chaptered into law on September 27, 2012 (Chapter 602, Statutes of 2012), requires the California Public Utilities Commission (CPUC) to adopt standards for constituents of concern in biogas to protect human health and pipeline integrity and safety by December 31, 2013 (Health and Safety Code Section 25421(d)). To support CPUC's efforts, AB 1900 specifies that CARB and OEHHA develop health protective standards for constituents of concern in biomethane and

to update these standards every 5 years or sooner if the data warrant (Health and Safety Code Section 25421(e)).

The first biomethane safety standards were adopted by the CPUC in D.14-01-034. Ordering Paragraph 7 of that Decision required California's large gas IOUs to file an Application with the CPUC every five years so that the CPUC could update those standards pursuant to the timeline specified in state statute. However, new biomethane safety standards were not proposed by CARB and OEHHA for the first update cycle (i.e., Jan 1, 2014 through Dec 31, 2018). As such, the IOUs on November 16, 2018 requested pursuant to Rule 16.6 of the CPUC's Rules of Practice and Procedure to be relieved of the obligation to file that Application until a later date. That request was granted by the CPUC's then-Executive Director Alice Stebbins on Dec 10, 2018 with a specification that the IOUs file a new Application no later than six months from the date that a new report is issued by CARB and OEHHA with recommendations for further revisions to the established biomethane safety standards.

The enclosed recommendations satisfy these requirements in Paragraph 8 of D.14-01-034, and include an updated list of constituents of concern, their associated health protective levels, and recommendations for monitoring, testing, reporting and recordkeeping requirements. These recommendations were developed through a public process including a public workshop and stakeholder meetings.

The report is also posted on OEHHA's website at <https://oehha.ca.gov/air/document/biogas-and-human-health>. If you have any questions regarding the recommendations, please contact Carolyn Lozo, Chief, Oil and Gas and GHG Mitigation Branch, California Air Resources Board at (279) 208-7306 or Carolyn.Loza@arb.ca.gov, or contact Alvaro Alvarado, Ph.D., Section Chief, Community Health and Environmental Impacts Section, Office of Environmental Health Hazard Assessment at (916) 324-7441 or Alvaro.Alvarado@oehha.ca.gov.

CARB looks forward to continuing to work together to ensure the safety of Californians as we seek to reduce SLCP emissions and meet our climate goals.

Rachel Peterson, Executive Director
Leuwam Tesfai, Deputy Executive Director for Energy and Climate Policy
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Attachment

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