



18 January 2008

Steven Church  
California Air Resource Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments on ETAAC Report Discussion Draft**

Dear Mr. Church:

The Air Issues and Regulations (AIR) Committee is a coalition of San Francisco Bay Area Publicly Owned Treatment Works (POTWs) working cooperatively to address air quality issues, under the guidance of the Bay Area Clean Water Agencies (BACWA). Many of our member agencies also manage potable water treatment, distribution systems, wastewater treatment, and biosolids residual programs. The AIR Committee has 18 member agencies, including large metropolitan facilities such as East Bay Municipal Utility District, the City and County of San Francisco, Central Contra Costa Sanitary District, and the City of San Jose. Together, AIR Committee member agencies treat over ninety percent of the municipal wastewater in the Bay Area.

We understand that the goals of AB-32 and the proposed ETAAC discussion report are to initially meet the 1990 greenhouse gas (GHG) emissions levels by 2020, with long term reduction goals that require fundamental changes in consumer behavior, energy use and in the infrastructure that support virtually all economic activity. The major strategies proposed by ETAAC are 1) accelerate GHG emissions reductions through explicit definitions of the proposed “early action” items in AB-32 and 2) balance a portfolio of economic and technology policies by implementing a “cap and trade system” and other market barriers not addressed and 3) create innovative public funding to complement private investment through RD&D of new low- and zero-carbon technologies and 4) create international and domestic partnerships through the public and private sector along with agreements between international entities and 5) coordinate across state agencies to reduce GHG emissions from governmental operation and stakeholders. This report and the future work of ETAAC have the potential to impact our member agencies while simultaneously benefiting the public through emissions reductions. Therefore, we have

reviewed the proposed ETAAC discussion report, and have summarized our major concerns in this comment letter.

In general, we are concerned that the report does not give enough credit to biosolid residuals from wastewater treatment plants, which may result in inconsistencies in the development of technology research and investment opportunities.

- 1) ***Biosolids as Alternative Energy***: As currently proposed by AB-32, POTWs and wastewater treatment would be categorized in Chapter 4: Industrial, Commercial, and Residential Energy Use. In wastewater treatment facilities, biosolids are produced as the solid residual byproduct from wastewater. Biosolids provide energy generation due to their nutrient rich composition and have proven these characteristics in extensive application, not limited to digester and natural gas production, drying, and combustion. Although this is widely recognized, the ETAAC report does not reference wastewater residuals and their further use for alternative energy generation. Similarly, in Chapter 2: Financial Sector of the report, wastewater treatment is reference as a “Cleantech”, but is not again mentioned or the benefits of the wastewater industry developed.

In order to provide more robust energy alternatives and inclusion of an already viable resource, we recommend that the ETAAC further investigate and include biosolids for alternative energy generation.

- 2) ***Bay Area Residual Management***: In the Bay Area, a sub-group of BACWA has been formed (Bay Area Regional Solids Processing Facility [BARSPF]) to discuss the further development of biosolids residual management and future practices. This group has already undergone extensive research and investigated numerous feasibility options. Paramount discussions with this group have included energy generation and GHG mitigation. One technology that has had significant investigation is combustion. In Chapter 4, Section G, combustion devices are mentioned as a technology, which could be further utilized with biosolids demonstration. Several POTWs in the Bay Area have biosolids combustion in operation and could benefit from cleaner technology and energy production. The only discussion of industry energy facilities is in Section O: Waste Conversion Evaluation of Chapter 4, which addresses municipal waste, but does not include wastewater residuals.

In order to prove more cost feasibility and ease of program implementation, we would recommend that ETAAC consider biosolids as a means for further investigation and include biosolids in the discussion for waste conversion and cleaner incineration.

- 3) ***Diversification of Waste***: As currently written, the report makes mention of diversification of municipal wastes, but only addresses such issues on a broad level. Each component of this waste represents different chemical characteristics and energy value. We would recommend that further investigation involve separation of wastes such as food, composting, or biosolids so each have devoted investigation.
- 4) ***Biosolids-to-Energy Facilities***: In Chapter 6: Agriculture Sector, Section II: An Agriculture Global Warming Solutions Program, Subsection A: Manure-to-Energy Facilities, the report

discusses options for utilization and energy capture of agricultural manure. This section addresses the ease of implementation, the ready availability of this resource, and the benefits of energy production. The barriers and solutions listed in Subsection A are in regards to lack of energy facilities and ability to work with regulators, both barriers requiring significant cross-media coordination. While a manure-to-energy facility exhibits some barriers, the ETAAC finds it as a viable and beneficial option.

Based on this analysis, we would recommend that a similar section of the report is dedicated to a biosolids-to-energy facility. The composition and benefits of biosolids are comparable to manure and could provide the same benefits. While the wastewater industry may face barriers such as biosolids regulation, it does not face the same hurdle of facility inadequacy. There are biosolids facilities in operation throughout the state of California and in the absence of facilities, utilities are in desperate need of finding a solution for the continuous generation of biosolids.

We urge you to consider our recommended changes to the proposed ETAAC draft report. We believe that ARB and ETAAC should ensure that the proposed report provide consistent guidance throughout the State of California for future technological and financial investments.

Please contact Meghan Hartman at (510) 587-7547 or Jim Sandoval at (510) 610-9301 with any questions or comments. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Randy Schmidt".

Randy Schmidt  
Chair, Air Issues and Regulations Committee