

DENNIS A. BURKE, P.E.

360-923-2000

January 28, 2008

Mr. Steve Church, Research Division  
California Air Resources Board  
1001 I Street, PO Box 2815  
Sacramento, California 95812

Gentlemen:

Section 4 of the ETAAC report "Industrial, Commercial, & Residential Energy Use" subsection L, page 4-15 delineates the benefits of composting. This is hardly the case. Composting releases significant quantities of methane, ammonia, and nitrous oxide. In addition composting increases transport energy use as well as energy use in the process of aerobic composting. Given those facts the IPCC limits the GHG benefits associated with composting to those applications where methane emissions are not captured.

Some clarity is required regarding composting. The CIWMB includes both anaerobic digestion and aerobic composting in the term "composting". Aerobic composting produces significant quantities of GHG's that are not captured in addition to significant energy consumption associated with increased transport and the compost process itself. In most cases it is a net GHG producer. Anaerobic digestion on the other hand captures the GHG's for combustion or renewable energy production. Anaerobic digestion also produces ammonia which may lead to N<sub>2</sub>O emissions.

The best option is to use anaerobic digestion with methane gas capture for renewable energy production and ammonia nitrogen removal and capture. Captured ammonia nitrogen will displace the consumption of natural gas used to produce ammonia. It's a win, win, win.

Sincerely,

Dennis Burke PE