

# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

January 20, 2017  
File No. 31-380.10

The Honorable Mary Nichols, Chair  
California Air Resource Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815

Via: Website Post: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Dear Chair Nichols and Board Members:

**Subject: Comments on the Air Resources Board December 2016 15-Day Amended Text of the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate this opportunity to comment on the *15-Day Amended Text of the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation*, dated December 21, 2016 (15-Day Changes). The Sanitation Districts provide environmentally sound, cost-effective wastewater and solid waste management for about 5.3 million people in Los Angeles County and, in the process, convert waste into resources such as reclaimed water, energy, and recycled materials. The Sanitation Districts' service area covers approximately 800 square miles and encompasses 78 cities and unincorporated territory within the County through a partnership agreement with 24 independent special districts.

We strongly support the proposal to retain the limited exemption for waste-to-energy facilities through the second compliance period. Solid waste management is at a critical juncture here in California and keeping the three waste-to-energy facilities in operation, at least through the second compliance is critical to achieving the legislative goals outlined by SB 1383, and CARB, through the draft Short-Lived Climate Pollutant Reduction Strategy (SLCP).

SB 1383 sets out the extremely aggressive goal of diverting 50% and 75% organics from landfills by 2020 and 2025, respectively. As outlined in the SLCP and the many letters from the solid waste industry, meeting these goals will be very challenging taking a combination of efforts, not only by industry, but by the legislature to provide adequate infrastructure funding, regulatory agencies through streamline of requirements (e.g., permitting and siting), and cities

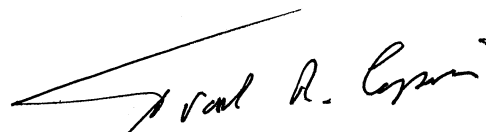
through the development of adequate collection and management of the organic waste stream. All of this will take time. If allowed to continue, the three waste-to-energy facilities in the state will act as an important "bridge" in solid waste management, as the organic infrastructure is organized and built to meet these challenges.

The Sanitation Districts have been aggressively working on solutions to expedite the organic diversion efforts. We currently have put in place the ability to co-digest food waste with biosolids at our Joint Water Pollution Control Plant in Carson. We are also in the process of seeking funding to expand this program, working with other solid waste industry partners, to increase our food waste digestion throughput and utilize excess biogas to generate transportation fuel. In addition, the Sanitation Districts are working with many associations with the goal to develop increasing infrastructure of organics management. As stated, the efforts to meet the SB 1383 goals will require a combined effort of the solid waste industry, the legislature and regulatory authorities, all working together. Allowing the limited exemption for waste-to-energy facilities through the second compliance period will send a strong message that CARB recognizes the challenges ahead in meeting the SLCP and SB 1383 goals, and is part of this effort.

There are significant greenhouse benefits in operating waste-to-energy plants over landfilling. COVANTA details these advantages in their correspondence. We will not repeat those here but support their analyses.

Thank you for the opportunity to comment on the 15-Day Changes. If you have any questions, please do not hesitate to contact the undersigned at this office.

Very truly yours,

A handwritten signature in black ink, appearing to read "Frank R. Caponi". The signature is written in a cursive style with a long, sweeping horizontal line at the beginning.

Frank R. Caponi  
Division Engineer  
Air Quality Engineering  
Technical Services Department

FRC:bb