



# CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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June 11, 2015

Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Submitted Electronically

[http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=slcpstrategy-  
ws&comm\\_period=1](http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=slcpstrategy-<br/>ws&comm_period=1)

Subject: CASA Comments on the Concept Paper on Short Lived Climate Pollutants

Dear Chair Nichols:

The California Association of Sanitation Agencies (CASA) is pleased to submit comments on the recently released *Concept Paper on How to Reduce Short Lived Climate Pollutants (SLCP) in California*. CASA is a statewide association of municipalities, special districts, and joint powers agencies that represent more than ninety percent (90%) of the sewered population of California. CASA has long been a proactive leader on wastewater treatment, recycled water, air quality, biosolids management, renewable energy, and climate change mitigation issues. CASA has been working with the Air Resources Board on this issue and generally concurs with the observations, conclusions, and recommended approach to reduce SLCPs.

CASA agrees strongly with the recognition that publicly owned wastewater treatment works (POTWs) are part of the solution and that we can maximize the use of existing infrastructure in anaerobic digesters and power generating units to reduce the release of SLCPs. The acceptance of hauled-in organic waste such as fats, oils, and grease (FOG), food waste (source separated, etc.), vegetative food waste (cannery, food processing etc.), and others for anaerobic digestion at POTWs is a steadily increasing practice, and an important management option for this valuable waste stream. Moving forward, this practice will be an integral component of, and POTWs a key partner in, achieving at least six significant state objectives by 2020: (1) to reduce the release of SLCP's to the atmosphere; (2) to provide 33% of the state's energy needs from renewable sources; (3) to recycle 75% of the solid waste generated in the state; (4) to achieve 1990 levels of carbon dioxide equivalent emissions; (5) to reduce the carbon intensity of transportation fuel by 10%; and, (6) the Governor's Healthy Soils initiative.

We agree specifically with the observation that wastewater treatment plants are negligible methane emitters. As the concept paper recognizes, wastewater plants can: Greatly reduce emissions of methane by maximizing the use of existing anaerobic digesters through the receipt of hauled-in organic waste for co-digestion; sequester carbon in the soil and avoid the use of fossil fuel-intense inorganic fertilizer while improving soil health through the application of biosolids to agricultural land; and,

increase the productive use of the naturally created methane through power generation, pipeline injection, or conversion to transportation fuel. Furthermore, biosolids can be used to reclaim fire ravaged land and reduce the potential severity of future fires and the release of black carbon.

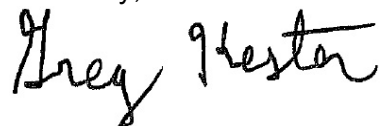
We recommend a thorough analysis and evaluation of barriers in certain air management districts in severe non-attainment for ozone, which may impede the objectives laid out in the concept paper. Such barriers include restrictive emission limits on internal combustion engines for oxides of nitrogen, volatile organic compounds (VOC), and carbon monoxide in the South Coast Air Quality Management District (SCAQMD). They also include restrictions on VOCs from biosolids compost facilities in the SCAQMD and the San Joaquin Valley Air Pollution Control District, even though research conducted at UC Davis has verified that such VOCs emitted from biosolids and green waste compost facilities are more than 90% non-reactive alcohols which do not contribute to ground level ozone. CASA welcomes the opportunity to provide more detail and information on these barriers with suggested solutions to overcome them.

Support and funding are needed to advance all of these practices which constitute the “low hanging” fruit in the reduction of SLCPs, and we recommend allocation of cap and trade auction proceeds to the State Water Boards as a key source of funding.

CASA looks forward to continued collaboration with CARB and other regulatory agencies to proactively reduce SLCP release and to achieve all of the laudable goals and mandates mentioned above. Please do not hesitate to contact me with any questions or for further information on any of these issues via email ([gkester@casaweb.org](mailto:gkester@casaweb.org)) or telephone (916) 844-5262.

Thank you again for the opportunity to provide our comments.

Sincerely,



Greg Kester  
Director of Renewable Resource Programs

cc: Ryan McCarthy – ARB  
Fran Spivey-Weber – Board Member, SWRCB  
Dorene D’Adamo – Board Member, SWRCB  
Caroll Mortensen – Director, CalRecycle  
Karen Ross – Secretary, CDFA  
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