



June 12, 2015

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

Submitted Electronically:

Dear Chairwoman Nichols:

**Re: SCAP Comments on the Concept Paper on Short Lived Climate Pollutants**

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) is pleased to submit comments on the recently released Concept Paper on How to Reduce Short Lived Climate Pollutants (SLCP) in California. SCAP represents 83 public agencies that provide essential water supply and wastewater treatment to nearly 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as recycled water and renewable energy. SCAP has been working with the Air Resources Board on this issue and generally concurs with the observations, conclusions and recommended approach to reduce SLCPs.

SCAP agrees with the recognition that publicly owned 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, vegetative food waste and others for anaerobic digestion at POTWs is a steadily increasing practice, and an important management option for this valuable waste stream.

We agree specifically with the observation that POTWs are negligible methane emitters. As the concept paper recognizes, POTWs 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.

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In order to achieve the full potential represented by POTWs, we recommend a thorough analysis and evaluation of both financial and regulatory barriers that exist. For example, the South Coast Air Quality Management District (SCAQMD) has very stringent emission limits on combustion equipment that may be utilized for managing biogas generated from digesters, which are difficult to achieve, and costly. In addition, restrictions on VOCs emissions from biosolids compost facilities in the South Coast Air Basin are equally costly and difficult to achieve. A similar regulatory environment exists in the San Joaquin Valley Air Basin.

Therefore, regulatory support and funding are needed to advance all of these practices which constitute the "low hanging" fruit in the reduction of SLCPs. AB 32 Cap and Trade auction proceeds should be the primary source of funding for this project since they represent significant reduction in greenhouse gas emissions. We strongly recommend that the SLCP focus on the needed regulatory support and funding so that POTWs can be a part of the solution in reducing methane emissions.

Thank you for the opportunity to provide comments. SCAP looks forward to continued collaboration with CARB and other regulatory agencies to proactively reduce SLCP. Please do not hesitate to contact Mr. Frank Caponi of the Los Angeles County Sanitation Districts should you have any questions at (562) 908-4288, extension 2460.

Sincerely,

A handwritten signature in black ink, appearing to read "John Pastore". The signature is fluid and cursive, with the first name "John" written in a more compact, stylized manner and the last name "Pastore" written in a more extended, flowing script.

John Pastore, Executive Director

cc: Ryan McCarthy – CARB  
Fran Spivey-Weber – SWRCB  
Dorene D'Adamo – SWRCB  
Caroll Mortensen – CalRecycle  
Julia Levin – BAC  
Sarah Deslauriers – CWCCG