CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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May 30, 2014

To Whom it May Concern VIA ONLINE PORTAL FOR COMMENT SUBMITTAL

RE: Proposed Pathways for Wastewater Biomethane to Low Carbon Transportation Fuel

The California Association of Sanitation Agencies (CASA) is pleased to provide comments on the proposed pathways for the conversion of biomethane from mesophilic anaerobic digestion at publicly owned treatment works (POTWs) to low carbon transportation fuel. CASA is a statewide association of cities, counties, special districts and joint powers agencies that provide wastewater collection, treatment, water recycling and biosolids management services to more than 90% of the sewered population of California.

CASA greatly appreciates that the California Air Resources Board (CARB) has developed these critical pathways and offers generally strong support for their adoption. We have a few questions, comments, and requests for clarification as detailed below.

1. Why are the pathways only for mesophilic digestion? What would be different if the digesters are operated in the thermophilic temperature range (other than perhaps a greater volume of biogas produced). Many POTWs are moving toward thermophilic digestion and the biomethane produced therein should be eligible for the LCFS.

2. In the pathway for plants with flows above 20 MGD*; it is assumed biogas is used for:
    a. thermal recovery for digester heating
    b. sludge treatment processes
    c. gas cleaning
    d. gas compression
    e. transportation fuel production, and
    f. power for export to the grid

Would on-site use of the power, which is much more common than export to the grid, yield the same credit as export to the grid for the excess power produced?

3. In both pathways, it is assumed that both thermal recovery and/or power production is accomplished in a compliant device and credit is given for that. However it appears that credit is also assigned for avoided flaring emissions (as if one flared 100% of the biogas). This seems like a double counting of the same credit (avoided flaring plus energy production). Even though this would benefit POTWs, clarification is requested to ensure credibility for the pathways.

4. Why is credit not granted for the land application of biosolids which avoids the use of fossil fuel intense inorganic fertilizer and sequesters carbon in the soil? More than 55% of the biosolids produced in California are land applied so this is a significant component of the pathway. Such credit is provided for in the national GREET1 model used as the basis for California pathways, so should also be included in this pathway.

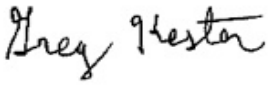
5. How would co-digestion and the resulting increased gas production and avoidance of GHG emissions from other organic disposition options be factored into these pathways?

6. Does the pathway for large POTWs apply to those treating over 100 MGD or is 100 MGD a cutoff? Our understanding is that it would apply to all POTWs with mesophilic digestion treating more than 20 MGD.

7. Will a pathway be developed for POTWs treating less than 5 MGD but which also have anaerobic digestion?

CASA appreciates the effort expended by CARB staff regarding the development of these pathways. Please contact me for any clarification or for further information on our comments.

Sincerely,



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