



March 24, 2016

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

**Re: California Association of Sanitation Agencies Comments Regarding the Mitigation Program to Address the Climate Impacts of the Aliso Canyon Natural Gas Leak**

Dear Chair Nichols and Board Members:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the Draft Aliso Canyon Methane Leak Climate Impacts Mitigation Program (Draft Mitigation Program). CASA is an association of local agencies, engaged in advancing the recycling of wastewater into usable water, generation of renewable energy, and other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians. One of CASA's priorities is to address climate change policies, initiatives, and opportunities through a unified voice advocating for wastewater community perspectives. Our members are focused on helping the State achieve its multiple mandates and goals by 2020 and beyond, including:

- Reducing carbon dioxide equivalent emissions to 40% below 1990 levels
- Providing 50% of the State's energy needs from renewable sources
- Reducing carbon intensity of transportation fuel used in the State by 10 percent
- Effectively eliminating organic waste disposal in landfills and recycling 75% of solid waste in the state
- Increasing soil carbon under the Healthy Soils Initiative and Forest Carbon Plan
- Reducing short-lived climate pollutant emissions (specifically, methane emissions 40% below 2013 levels)

CASA agrees with the basic concepts and steps articulated in the Draft Mitigation Program. In addition to providing the essential public service of cleaning water and treating biosolids, the wastewater sector can maximize resource recovery from a wide array of waste streams and potential end-products. Wastewater treatment plants can do this while reducing the release of methane with fairly minor ancillary upgrades by maximizing the use of existing infrastructure (i.e., anaerobic digesters, power generating units, and biosolids treatment facilities), which will serve as near term mitigation solutions for the Aliso Canyon leak.

The acceptance of hauled-in organic waste such as fats, oils and grease (FOG), food waste (source separated), vegetative food waste (cannery, food processing, etc.), and others for anaerobic digestion at POTWs is an important management option for this mitigation program.

***We estimate that the wastewater sector has existing excess capacity to co-digest up to 75% of the food waste and FOG currently being landfilled.*** To help quantify the potential, CASA has prepared a preliminary estimate of existing excess capacity at wastewater treatment plants for which food waste and FOG diverted from landfills could be accepted for co-digestion. We estimate that wastewater agencies have capacity in existing digesters to accept up to 75% and possibly more of

the food waste/FOG currently being landfilled. Of course, other factors will help determine the practical reality of being able to accept this fraction of food waste; including operational limitations, adequate

funding to ensure cost-effectiveness, capacity which may be claimed by increased flow from connected users, and effective high level support for the recycling of resulting biosolids. While a few treatment plants are successfully piloting co-digestion of food waste, it is not a common practice and therefore not business as usual.

Utilizing the additional biogas produced for on-site power needs, for conversion to transportation fuel, or for pipeline injection will all further the promotion of sustainable energy infrastructure which is the second bulleted area of concentration in the Draft Mitigation Program. Ancillary infrastructure for biogas clean up, emission controls, and power generating units are necessary mitigation components.

We recommend the Draft Mitigation Program seek to maximize partnerships with wastewater treatment agencies as a prime mitigation strategy. Wastewater plants are already permitted with basic infrastructure in place to accept diverted organics for co-digestion. Ancillary infrastructure is needed to pre-process food waste such that it is acceptable for receipt, receiving facilities are needed at wastewater treatment plants for effective on-site management, anaerobic digestion upgrades for improved mixing and heating may be necessary in some cases, power generating units to utilize the increased biogas, gas cleaning as necessary, related technology to ensure compliance with emission limits, and support for beneficial use of resulting increase in biosolids should all be eligible investments in the Draft Mitigation Program.

Biosolids used as soil amendments from anaerobic digesters at California wastewater treatment plants further mitigates climate change by **sequestering carbon in the soil and avoiding the use (and production) of fossil fuel based inorganic nitrogen fertilizer (i.e., nearly a quarter of a gallon of fossil fuel is required for every pound of inorganic nitrogen produced)**. Biosolids also significantly improve soil health, increase crop yields, and increase the soil's water holding capacity (thereby reducing irrigation demand).

In summary, wastewater treatments plants provide multiple co-benefits while mitigating the Aliso Canyon leak and helping the state achieve its laudable goals. They can:

- Significantly reduce emissions of methane by maximizing the use of existing anaerobic digesters through the receipt and management of hauled-in organic waste for co-digestion.
- Sequester carbon in soil through the application of biosolids to agricultural land, thereby avoiding use of fossil fuel-intense inorganic fertilizer while improving soil health, crop yields, and water holding capacity.
- Increase the productive use of the captured methane through power generation, on-site heating needs, pipeline injection, or conversion to transportation fuel.

Again, CASA appreciates the opportunity to provide comments on the Draft Program and looks forward to working with ARB, Southern California Gas Company, and other agencies moving forward. Please contact us if you have any questions at (916) 446-0388 or via email at [gkester@casaweb.org](mailto:gkester@casaweb.org) and [sdeslauriers@carollo.com](mailto:sdeslauriers@carollo.com). We welcome the opportunity to further discuss the wastewater community's position in helping to proactively mitigate impacts from the Aliso Canyon leak.

Sincerely,



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Climate Change Program Manager

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