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June 12, 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-
ws&comm_period=1)

Re: California Wastewater Climate Change Group Comments Regarding the Concept
Paper on the Short Lived Climate Pollutant Reduction Strategy

Dear Chairman Nichols and Board Members:

The California Wastewater Climate Change Group (CWCCG) appreciates the opportunity to comment on the Short Lived Climate Pollutant (SLCP) Reduction Strategy Concept Paper. The CWCCG is a statewide group of municipalities that collect and treat over 90 percent of municipal wastewater in California, many of whom also provide recycled water services and actively participate in the beneficial use of biosolids and biogas. The CWCCG's mission is to address climate change policies, initiatives, and challenges through a unified voice advocating for wastewater community perspectives. The CWCCG members are focused on helping the State achieve its multiple mandates and goals by 2020, including: (1) providing 33 percent of the State's energy needs from renewable sources; (2) reducing carbon dioxide equivalent emissions to 1990 levels; (3) reducing the carbon intensity of transportation fuel used in the State by 10 percent; (4) recycling 75 percent of the solid waste generated in the State; (5) increasing the carbon in soil under the Healthy Soils Initiative; and (6) reducing SLCP emissions.

CWCCG strongly supports and agrees that publicly owned (wastewater) treatment works (POTWs) are part of the solution. In addition to our primary focus on water quality and providing an essential public service, the wastewater sector can "maximize resource recovery from a wide array of waste streams and potential end-products." POTWs can do this while reducing the release of SLCPs by maximizing the use of existing infrastructure (i.e., anaerobic digesters and power generating units). 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 a steadily increasing practice, and an important management option for this valuable waste stream.

CWCCG also agrees with the conclusion that POTWs emit only small amounts of methane. Figure 2 shows "wastewater" as contributing 4 percent to the state's total methane emissions in 2013. However, if the same "wastewater" sources that are considered in 2012 (in the Updated Scoping Plan) are also considered in Figure 2 of this Concept Paper for 2013, then nearly 50 percent of the "wastewater" methane emissions in Figure 2 are from industrial wastewater systems and another 25% are from septic systems not owned or operated by POTWs. CWCCG recommends separating septic system emissions from the estimate of "wastewater" related emissions (consistent with how these emissions are treated in the U.S. Inventory) and noting the percentage of industrial wastewater versus POTW (or domestic) wastewater related emissions. This will improve CARB's inventory by accounting for emissions that are within the POTW's operational boundaries.

For air districts having authority in areas of severe non-attainment for ozone, we recommend a thorough analysis and evaluation be performed on barriers that may impede the objectives laid out in the Concept Paper. Such barriers include restrictive emission limits for oxides of nitrogen, volatile organic compounds (VOC), and carbon monoxide on internal combustion engines that fire biogas in the South Coast Air Quality Management District (SCAQMD). These criteria air pollutant emission limits discourage the use of biogas and the accompanying GHG reductions. In addition, restrictions on VOCs from biosolids compost facilities in the SCAQMD and the San Joaquin Valley Air Pollution Control District also discourage biosolids composting, 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. CWCCG welcomes the opportunity to provide more detail and information on these barriers along with suggested solutions to overcome them.

As the Concept Paper states, POTWs are capable of contributing toward multiple statewide goals. A single project is capable of:

- Significantly reducing emissions of methane by maximizing the use of existing anaerobic digesters through the receipt of hauled-in organic waste for co-digestion;
- Sequestering carbon in soil and avoiding use of fossil fuel-intense inorganic fertilizer while improving soil health through the application of biosolids to agricultural land;
- Increasing the productive use of the captured methane through power generation, pipeline injection, or conversion to transportation fuel.
- Furthermore, biosolids can also be used to reclaim fire ravaged land and reduce the potential severity of future wild fires (the primary source of black carbon).

Support and funding are needed to advance these practices which constitute the "low hanging" fruit in the reduction of SLCPs. We recommend allocation of cap and trade auction proceeds to the State Water Resources Control Board as a key source of funding for POTW projects.



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Please contact me if you have any questions at (925) 705-6404 or sdeslauriers@carollo.com. We welcome the opportunity to further discuss the wastewater community's position and help ARB proactively reduce SLCP emissions to achieve the commendable State goals and mandates for 2020 and beyond.

Sincerely,

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cc: Ryan McCarthy – ARB
Fran Spivey-Weber – Board Member, SWRCB
Dorene D'Adamo – Board Member, SWRCB
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