



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Program Environmental Impact Report (Draft PEIR) for the Proposed
Adoption of Regulations to Implement Senate Bill 1383 - Short Lived Climate Pollutants: Organic
Waste Methane Emission Reduction (SCH No.: 2018122023)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final PEIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to adopt new regulations (Proposed Project) that will achieve the organic waste disposal reduction and edible food recovery targets identified in Senate Bill 1383 (SB 1383) – Short-Lived Climate Pollutant (SLCP) Reduction Strategy, adopted by the California Air Resources Board in 2016. SB 1383, which is a part of the State's 2017 Climate Change Scoping Plan, requires achieving a 50 percent reduction in statewide disposal of organic waste from 2014 levels by 2020, and a 75 percent reduction by 2025¹. Additional requirements include recovering a minimum of 20 percent of edible food currently in the organic waste stream for human consumption by 2025². The Proposed Project will be implemented statewide and provides provisions for activities such as organic waste collection and recovery, and contamination standards at organic waste processing facilities.

Background on South Coast AQMD Rule 1118.1 – Control of Emissions from Non-Refinery Flares

On January 4, 2019, South Coast AQMD's Governing Board adopted Rule 1118.1 – Control of Emissions from Non-Refinery Flares³. Rule 1118.1 is intended to reduce oxides of nitrogen (NOx) and volatile organic compounds (VOC) from non-refinery flares located at landfills, wastewater treatment plants, oil and gas production facilities, and facilities that handle organic liquids⁴, and it encourages beneficial use alternatives to flaring, such as energy generation, transportation fuels, or pipeline injection⁵.

As California works towards meeting the waste reduction goals identified in SB 1383, there are efforts to divert organics, including food waste, from landfills to composting facilities and anaerobic digesters, such as those at wastewater treatment plants. As composting and wastewater treatment facilities receive an increase in organic inputs, there could be an increase in the volume of biogas generated and flared at these facilities. During the rule development process for Rule 1118.1, stakeholders provided South Coast AQMD staff with information which showed that digestion and co-digestion of high protein food waste (e.g., meat) can result in generation of biogas containing fuel-borne ammonia, which, when flared, results in excess NOx

¹ Draft PEIR. Executive Summary. Page 1.

² *Ibid.*

³ South Coast AQMD. Rule 1118.1 – Control of Emissions from Non-Refinery Flares. Adopted January 4, 2019. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/R1118-1.pdf>.

⁴ *Ibid.*

⁵ *Ibid.*

emissions⁶. As part of the adoption of Rule 1118.1, South Coast AQMD's Governing Board directed staff to conduct a Best Available Control Technology (BACT) Technical Assessment and work with California Air Pollution Control Officers Association (CAPCOA), the Lead Agency, California Association of Sanitation Agencies (CASA), and Southern California Alliance of Publically Owned Treatment Works (SCAP) in an effort to balance air quality requirements with the statewide effort of implementing SB 1383⁷. For more information on the BACT Technical Assessment, please visit the South Coast AQMD's website, at: <https://www.aqmd.gov/home/rules-compliance/compliance/r1118-1/tech-assessment>.

South Coast AQMD Staff's Comments

South Coast AQMD staff has included the following methods for reducing or removing fuel-borne ammonia, which the Lead Agency should consider for Air Quality Impact 3.3-2 in the Final PEIR.

- Diversion of high strength, high protein food waste to rendering facilities where this type of food waste can be processed with minimal air quality impacts. This is a feasible method that is currently used by a major supermarket chain in the South Coast AQMD jurisdiction, which repurposes and diverts scraps and cuttings from the butchering process from the landfill and ships them to a local rendering facility for processing.
- Use of digester gas treatment technology such as Wet Chemical Scrubbers to remove fuel-borne ammonia from the biogas stream that will be flared.
- Other technologies available for removing fuel-borne ammonia from a digester gas stream include water scrubber, biological scrubber, and adsorption activated static bed media⁸.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final PEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

JW:LS:AM

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Control Number

⁶ South Coast AQMD. Final Staff Report Proposed Rule 1118.1 – Control of Emissions from Non-Refinery Flares. Page 1-5. Accessed at: <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-jan4-023.pdf>.

⁷ South Coast AQMD. A Resolution of the Governing Board of the South Coast Air Quality Management District certifying the Final Environmental Assessment for Proposed Rule 1118.1 – Control of Emissions from Non-Refinery Flares. Accessed at: <https://www.aqmd.gov/docs/default-source/planning/rule-1118.1/1118-1-resolution-final.pdf>.

⁸ Brown & Caldwell. 2018. Presentation at Water Environment Federation (WEF) Residuals and Biosolids Conference. *Ammonia-Laden Digester Gas: The Next Frontier in NOx Emissions*.