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SOLID WASTE MANAGEMENT COMMITTEE/  
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April 15, 2010

The Honorable Gloria Romero  
State Capitol Building, Room 2090  
Sacramento, CA 95814

Dear Senator Romero:

**SENATE BILL 624 (AMENDED APRIL 13, 2009)  
ANAEROBIC DIGESTION**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) applauds you for authoring Senate Bill 624 (SB 624), which would define the term “anaerobic digestion” for purposes of the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended). The proposed legislation, if signed into law, would remove anaerobic digestion from the overly broad definition of “transformation” currently in statute. The Task Force **supports SB 624, if amended**, to remove the specific reference to the temperature of 140 degrees Fahrenheit and allow the State Department of Resources, Recycling and Recovery (CalRecycle) to set the allowable temperature.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of 10 million. Consistent with these responsibilities, and to ensure a coordinated and cost-effective and environmentally-sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

Together with the County of Los Angeles, the Task Force has evaluated a wide variety of conversion technologies, including anaerobic digestion. Conversion technologies are advanced processes that convert post-recycled residual solid waste into useful products, green fuels, and clean, renewable energy. Conversion technologies may be thermal, chemical, or biological but are not incinerators as there is no combustion of the waste. Unfortunately, the State of California has yet to establish a statutory definition for these new technologies that acknowledges their environmental benefits.

SB 624 would establish a separate definition for “anaerobic digestion” that ensures facilities utilizing anaerobic digestion aren’t classified as “transformation” facilities under State law, which would subject the facilities to unnecessarily onerous provisions applied to solid waste disposal facilities. Unfortunately, the proposed definition specifies that the “temperature during the process does not exceed 140 degrees Fahrenheit” in order to qualify. As industry develops additional methods of converting solid waste into marketable products through anaerobic digestion, process temperatures may increase to maximize efficiency and production of biogas.

BioCycle Magazine (February 2010 edition) reports that anaerobic digestion is advancing throughout the world, specifically in Europe, where digester capacity is expected to exceed six million tons per year by the end of 2010. Specifically, higher temperature processes, such as thermophilic digestion, are becoming more prevalent. CalRecycle points out that higher temperatures result in more rapid reactions, which translates to smaller reactors needed to process a given waste stream (Current Anaerobic Digestion Technologies Used for Treatment of Municipal Organic Solid, 2008).

For these reasons, the Task Force respectfully requests that the language referencing a maximum process temperature of 140 degrees Fahrenheit be removed from the bill and that peak processing temperature determination be regulated instead by CalRecycle. Therefore the Task Force **supports SB 624, if amended.**

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We appreciate your consideration of our comments and we look forward to working with you in realizing our mutual goal of a more sustainable California. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor, City of Rosemead

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cc: Senator Darrell Steinberg, President Pro Tem  
Assembly Speaker John A. Perez  
Senator Dean Florez, Majority Leader  
Senator Dennis Hollingsworth, Minority Leader  
Assembly Member Martin Garrick, Minority Leader  
Each Member of the Assembly Natural Resources Committee  
Each Member of the Los Angeles County Legislative Delegation  
Each Member of the County of Los Angeles Board of Supervisors  
Each City Mayor in the County of Los Angeles  
California State Association of Counties  
League of California Cities  
League of California Cities, Los Angeles County Division  
Southern California Association of Governments  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Alternative Technology Advisory Subcommittee  
Each City Recycling Coordinator in Los Angeles County