MARK PESTRELLA, CHAIR
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

November 15, 2018

Mr. Scott Smithline, Director
California Department of Resources
Recycling and Recovery (CalRecycle)
1001 I Street
Sacramento, CA 95814

Ms. Mary Nichols, Chair
California Air Resources Board (CARB)
1927 13th Street
Sacramento, CA 95811

Dear Mr. Smithline and Ms. Nichols:

REQUEST FOR CALRECYCLE AND CARB'S PARTICIPATION/INVOLVEMENT IN DEVELOPMENT OF CALIFORNIA PUBLIC UTILITIES COMMISSION BIOMETHANE COMMON CARRIER PIPELINE INJECTION

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) respectfully requests CalRecycle's and CARB's participation in the California Public Utility Commission (CPUC) biomethane common-carrier pipeline injection specifications development. The results of the said specifications highly impact your agencies goals to divert organics waste from landfill disposal and reduce greenhouse gas (GHG) emissions.

As requested pursuant to Senate Bill 840 (2016), the California Council on Science and Technology (CCST) conducted a study on injection of Biomethane into California Common Carrier Pipelines that assessed biomethane minimum heating values and maximum siloxane specifications, for use by CARB's Rulemaking 13-02-008. The result of the CCST Study became available on September 26, 2018 (link below).

http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M229/K988/229988175.PDF

The CCST Study recommends reducing the biomethane heating value from 990 British Thermal Units (BTU) to 970 BTU and that further research is needed to make any determinations regarding the siloxane concentrations. CCST Study found that the "current California siloxane specifications are based on very little data and large extrapolation from that data." The Task Force is in favor of CCST's recommendation to support a comprehensive research program to understand operational, health, and safety consequences of various concentrations of siloxanes, which will help the CPUC establish an appropriate siloxane limit but should be expedited in concert with information/data regarding out-of-state biomethane common-carrier gas pipeline injection. CCST Study has noted that

there are over 50 projects in other states with regulatory standards that allow biomethane with higher levels of siloxane injected into the pipeline with no documented negative effects. Furthermore, while the current California maximum siloxane specification is at 0.1 mg Si/m^3, most equipment manufacturer siloxane specifications are at 4 mg Si/scf or higher, a significant divergence with no documented justification. Maintaining a regulatory specification that is so minute and no standard method for measuring siloxane at this level exists could result in regulatory error that may prevent a project from injecting biomethane into the pipeline, and to be financially insolvent.

The divergence of out-of-state versus in-state biomethane standards is stifling domestic California biomethane production and injection into the pipeline while there is no documented benefit for this divergence in standard (emphasis added). The stifling of biomethane production prevents a key incentive to building infrastructure to divert organic waste and thus also preventing the reduction of methane, the most potent GHG and Short-Lived Climate Pollutant (SLCP). The questionable siloxane specification is preventing key developments for achieving Senate Bill 1383 (2016) SLCP's goals of 40 percent GHG reduction by 2030 and 75 percent organic waste diversion by 2025.

Additionally, the CCST study recommends monitoring the ASTM International process to adopt and test a standard test method for siloxanes, and to use the learnings from the siloxane research and the ASTM International process to revisit the siloxane maximum standards once more complete information becomes available. This recommendation of postponing revising the siloxane maximum standard until a lengthy, probable three-to-four-year, international process and other siloxane research is complete could cause significant delay in the investment of much needed organic waste recycling infrastructure.

Thus, the Task Force is requesting for CalRecycle and CARB's involvement/participation in CPUC's Biomethane Specification discussion to help resolve a solution for siloxane specifications and establish a common standard, considering the out-of-state injection disparity, and expedite research and solutions on siloxane testing or developing additional options such as blending (emphasis added).

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989, 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 ten million. Consistent with these responsibilities and to ensure a coordinated, 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, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of local and regional governmental agencies.

The Task Force respectfully requests that CalRecycle and CARB be involved in the CPUC development of Specification for biomethane common-carrier gas pipeline injection discussion for reasons as discussed in this letter. Should you have any questions regarding these comments, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,

Margaret Clark

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

EC:cs
P:\eppub\BudgetIT\TASK FORCE\Task Force\Letters\2018\November\BiomethaneLettertoCalRecycleandCARB.docx

cc: Governor Edmund G. Brown, Jr.
Melinda Grant, Office of Governor Edmund G. Brown, Jr.
Michael Picker, Chairman, California Public Utility Commission
Each Commissioner of the CPUC
Each Board Member of the CCST
Each Board Member of the CARB
Richard Corey, Executive Officer, California Air Resources Board
CalRecycle (Howard Levenson, Mindy McIntyre, Zoe Heller)
League of California Cities
League of California Cities, Los Angeles Division
California State Association of Counties
Each Member of the Los Angeles County Board of Supervisors
Sachi A. Hamai, Los Angeles County Chief Executive Officer
Each City Mayor/Manager in the County of Los Angeles
South Coast Air Quality Management District
South Bay Cities Council of Governments
San Gabriel Valley Council of Governments
Gateway Cities Counsel of Governments
Southern California Association of Governments (Carl Morehouse and Huasha Liu)
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force
Each Member of the Task Force Alternative Technology Advisory Subcommittee
Each Member of the Task Force Facility Plan Review Subcommittee