



March 9, 2017

SUBMITTAL VIA EMAIL TO: cleanairplan@baaqmd.gov

Mr. Josh Pollak
Environmental Planner
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

SUBJECT: COMMENT LETTER ON BAAQMD DRAFT 2017 CLEAN AIR PLAN:
SPARE THE AIR, COOL THE CLIMATE - A BLUEPRINT FOR CLEAN AIR
AND CLIMATE PROTECTION IN THE BAY AREA

Dear Mr. Pollak:

The Bay Area Clean Water Agencies Air Issues and Regulations Committee (BACWA AIR) appreciates the opportunity to comment on the Bay Area Air Quality Management District's (BAAQMD) Draft 2017 Clean Air Plan (Draft Plan). BACWA is a joint powers agency whose members own and operate publicly-owned wastewater treatment works (POTWs) that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay (SF Bay) Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. The AIR Committee is a coalition of SF Bay Area POTWs working cooperatively to address air quality and climate change issues, under the guidance of BACWA.

The BACWA AIR Committee agrees with the overarching goals of the Draft Plan - to protect the public and stabilize the climate. In fact, POTWs can help the Bay Area achieve these goals by supporting and complying with the identified control measures individually or regionally. While there are many control measures that are relevant to POTWs that we intend to engage in discussions with BAAQMD staff, we have provided comments below on specific key focus areas of the Draft Plan for your consideration.

Limiting Fossil Fuel Combustion

The Draft Plan calls for developing a region-wide strategy to improve fossil fuel combustion efficiency and eventually reduce fossil fuel combustion at industrial facilities, beginning with the three largest sources: oil refineries, power plants, and cement plants. Most POTWs in the Bay Area produce a low carbon, renewable fuel (digester gas) from the anaerobic digestion of sludge that can be used onsite for renewable electricity production or used at industrial facilities to offset fossil fuel (natural gas) combustion. BACWA would like to work with BAAQMD staff in

the development of this strategy to identify opportunities where POTWs can support the air district achieve its goal to limit the combustion of fossil fuels by replacing it with a low carbon, renewable digester gas.

Stop Methane Leaks

The Draft Plan calls for overall reduction in methane emissions from landfills, and oil and natural gas production and distribution. Extending the discussion provided above in support of limiting combustion at industrial facilities by capturing and beneficially using the digester gas (primarily methane) at POTWs, BACWA members are in a unique position to support this measure as well. As many POTWs have excess capacity in their existing anaerobic digesters, they are in a position to accept diverted organic waste (i.e., food waste) from landfills and co-digest it with sludge to generate even more digester gas. BAAQMD has very ambitious goals for the diversion of organics from their landfills, calling for 100 percent diversion by 2035. The only way to accomplish this within that time period and at a cost effective rate, is to consider the use of existing infrastructure (anaerobic digesters at POTWs) located in the hearts of Bay Area communities that can both process the material and generate renewable useful byproducts (digester gas and biosolids). BACWA strongly recommends including POTWs in the discussions of and development of solutions to this control measure.

Reducing Exposure to Toxics

BACWA supports the efforts to reduce emissions of toxic air contaminants (TACs). BAAQMD staff is already in the process of adopting more stringent limits and methods for evaluating toxic risks at existing and new facilities. BACWA is involved in the rule-making process, providing information on the planning challenges and economic impacts to POTWs. Unfortunately, the response times and potential cost requirements of projects necessary to comply with the proposed Rule 11-18 are unreasonable in order to get the required approval from their elected boards and public stakeholders. Additionally, the proposed rule is challenging the potential to divert organics from landfills to POTWs (making use of existing infrastructure) and generate more digester gas for beneficial use, since the increase of digester gas implies an increase in a potential source of TACs if combusted. There are various ways to avoid an increase in TAC emissions with the increase in digester gas, via air pollution control devices or incorporating an alternative use (i.e., transportation fuel). BACWA strongly recommends that BAAQMD carefully consider the comments submitted December 2nd, as well as the information provided in the March 9th workshop that BACWA held with BAAQMD staff focused on POTW impacts.

Promoting Clean Fuels

The Draft Plan also calls for promoting the use of clean fuels and low or zero carbon technologies in trucks and heavy-duty vehicles. Digester gas produced at POTWs is a low carbon renewable fuel that can be processed into transportation fuel to offset fossil fuel use in trucks and heavy-duty vehicles. Some BACWA members have already considered this as part of their planning efforts and can provide information on the economic and market feasibility of these types of projects. BACWA encourages BAAQMD staff to consider this as an option for the beneficial use of digester gas at POTWs.

Limiting Greenhouse Gases from POTWs

BAAQMD staff correctly noted that BACWA members are concerned about potential regulatory action inadvertently discouraging digester gas recovery and use as a fuel substitute. For example, Best Performance Standards for limiting air emissions from engines and boilers can be difficult for digester gas fired engines and boilers to meet cost-effectively. The air district has decided to

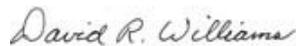
BACWA Comments on the Draft 2017 Clean Air Plan

initiate a process to better understand and quantify greenhouse gas (GHG) emissions at POTWs (both water and wastewater treatment facilities), to explore rulemaking to reduce GHGs emitted directly within POTWs (nitrous oxide and methane), and to work with POTW operators and existing organizations, such as BACWA, to obtain funding for the development of green infrastructure in POTWs. This measure will also explore the potential to streamline the permitting process to promote digester gas recovery, as well as address potential cross-media regulatory issues (such as Water Board regulations on nutrient removal). BACWA very much looks forward to partnering with BAAQMD staff in this process to address GHGs at POTWs.

Finally, in order to implement projects at POTWs that address the various needs of the Draft Plan in a cost effective manner (by making use of existing infrastructure) without placing an undue burden on their rate payers, there is a need for funding. We understand that BAAQMD projects distributing ~\$288 million between 2017 and 2024 to support implementation of control strategies. We ask that BAAQMD carefully consider funding projects at POTWs that not only have the potential to divert food waste from landfills and reduce the associated methane, but generate renewable resources that further offset dependence on fossil fuels and support the overall decarbonization of the Bay Area energy and fuel system.

Thank you for the opportunity to comment on the Draft Plan. BACWA supports BAAQMD's goal to protect the Bay Area's air quality, and asks staff to carefully address BACWA's concerns. We would be happy to discuss any questions regarding these comments. Nohemy Revilla and Randy Schmidt, BACWA AIR Committee Co-Chairs, can be reached at NRevilla@sfwater.org and RSchmidt@centralsan.org, respectively.

Sincerely,



David R. Williams
BACWA Executive Director

Cc: BACWA Executive Board
Nohemy Revilla, BACWA AIR Committee Co-Chair
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