



_____, CHAIR
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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
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September 6, 2011

Dr. Barry Wallerstein, Executive Officer
Dr. Elaine Chang, Deputy Executive Officer
Planning, Rule Development, and Area Sources
South Coast Air Quality Management District (SCAQMD)
21865 Copley Drive
Diamond Bar, CA 91765

Dear Dr. Wallerstein & Dr. Chang:

COMMENTS REGARDING THE DRAFT AQMD AIR-QUALITY-RELATED ENERGY POLICY (AUGUST 25, 2011 DRAFT)

Thank you for the opportunity to provide feedback on South Coast Air Quality Management District's (SCAQMD) Draft Air Quality-Related Energy Policy (Draft Energy Policy). On June 27, 2011, we sent a letter (enclosed) requesting additional stakeholder review of the Draft Energy Policy prior to it being adopted by your Governing Board. We appreciate the multiple public meetings your Staff has hosted since that time.

The Draft Energy Policy promotes zero and near zero emission strategies, calls for energy efficiency and conservation, and promotes greater use of renewables in the South Coast Air Basin (Basin). Collectively these actions are intended to reduce NOx emissions and help the Basin meet the federal ozone mandate. We are encouraged to see the SCAQMD's long standing policy of "fuel and technology neutrality" reaffirmed in the Draft Energy Policy.

During your stakeholder process, SCAQMD staff has emphasized the importance of agency collaboration in achieving NOx reductions throughout the Basin. This Task Force is currently working with the County of Los Angeles to develop solid waste conversion technologies - thermal, biological, chemical, and mechanical processes - capable of converting residual solid waste into renewable energy, fuels, and other marketable products. As you are well aware, both the collection and management of solid waste and other materials in the Basin represent substantial opportunities to reduce both stationary and mobile air emissions especially when evaluated on a **net** emissions basis.

Through extensive evaluation, we have concluded that these technologies are capable of significantly reducing **net** air emissions within the Basin, in the following three ways: (1) reducing transportation emissions resulting from long distance shipping of waste, (2) eliminating methane production from waste that would otherwise be landfilled, and

(3) displacing the use of fossil fuels by net energy (fuel and electricity) produced by conversion technologies.

This conclusion was reinforced in the 2007 Staff Report entitled *New and Emerging Conversion Technologies* developed by the California Department of Resources Recycling and Recovery (CalRecycle, formerly the California Integrated Waste Management Board), who found that “as compared to the alternative management scenarios, ***the conversion technology scenario ranges from two times lower in net energy consumption when compared to the waste-to-energy scenario, to 11 times lower than the landfill without energy recovery scenarios***” (*emphasis added*).

The Draft Energy Policy would be an ideal policy document to advocate for technologies that provide a **net** benefit to the Basin by directly providing a non-fossil based alternative for energy generation or fuel production. Under Action 5 on page 9 of the Draft Energy Policy, we would recommend that the District revise the statement starting on line 18 to “Many of the combustion processes that utilize these fuels do not currently achieve zero or near-zero emissions; ~~therefore, further technology development is needed in some applications.~~ however, these technologies have the potential to produce less emissions on a net basis when compared to other forms of solid waste or biomass management.”

We would welcome the opportunity to work with SCAQMD to ensure that the proposed Draft Energy Policy does not have unintended negative consequences on the growth of the solid waste conversion technology industry in the Basin.

Thank you for your consideration of our comments. 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
Council Member, City of Rosemead

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cc: Each Member of the Los Angeles County Board of Supervisors
South Coast AQMD (Dr. Sue Lieu, Dr. Aaron Kazenstein, & Dr. Greg Hunter)
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Alternative Technology Advisory Subcommittee