Frias, Christine

From: Mike Mohajer [mikemohajer@yahoo.com]

Sent: Wednesday, September 13, 2006 9:12 PM

To: Frias, Christine

Cc: Ruiz, Carlos; De La O, George

Subject: September 12, 2006 CIWMB Meeting, Agenda Item 22

Hi Christine,

Pls distribute the attachments to all Task Force Members & Alternates. Copies may also be needed for the 9/22 Task Force meeting. Thanks, Mike

MIKE MOHAJER mikemohajer@yahoo.com From: Mike Mohajer [mikemohajer@yahoo.com]

Sent: Monday, September 11, 2006 2:12 AM

To: Margo Reid Brown; Jeffrey Danzinger; Rosalie Mule; Gary Petersen; Pat Wiggins

Cc: Mark Leary; Howard Levenson; Fernando Berton

Subject: September 12, 2006 CIWMB Meeting - Agenda Item 22 Allocation Proposals FY 2006/07

Madam Chair and Members of the Board.

As a private citizen, I have reviewed your staff proposal for the subject item entitled "Consideration of Allocation Proposals To Be Funded From The Integrated Waste Management Account For Fiscal Year 2006/07." The proposal recommends funding for a number of programs that were included in your Board's August 15, 2006 Agenda Item No. 22, Emerging Technologies. I had provided comments on the said item on August 12, 2006, a copy attached. The item was subsequently pulled from the August 15, 2006 Agenda prior to the Board hearing.

I respectfully request that consideration of staff recommendations in re to the Allocation Proposals D-2, 4, 5 and 6 be postponed pending the resolution of the Board August 15, 2006 Agenda Item 22 and the following comments.

- 1. **Allocation Proposal D-2: Climate Change (\$500,000)** -- This item request funding for activities to increase recovery of recyclables, implementing waste diversion programs and improving landfill gas recovery activities. While the goal is to reduce greenhouse gas (GHG) emissions, the proposal as discussed in Attachment 1 of the subject Agenda, fails to consider the need to evaluate the impact of existing and expansion of waste diversion activities/recovery on efforts to reduce GHG emissions.
- 2. Allocation Proposal D-4: Solid Waste To Biofuels Forum (\$50,000) -- There have been numerous studies conducted nationwide on feasibility of producing biofuels from solid waste and results are available to staff. As such, the proposal should be deleted.
- 3. Allocation Proposal D-5: Production of Liquid Natural Gas (LNG) And Its Use In Municipal Vehicles (\$75,000) The intent of the proposal is to evaluate the technical feasibility of generating LNG from landfill gas for use as a transportation fuel. The proposal is unnecessary since there have been a number of studies conducted on the subject. In addition, the County Sanitation Districts of Los Angeles County has been using LNG generated from landfill gas at Puente Hills Landfill as a transportation fuel for a number of years.
- 4. **Allocation Proposal D-6: Anaerobic Digestion (AD) Pilot Project (\$200,000)** -- As indicated in my August 12, 2006 email, AD facilities have been in operation for many years in Asia and Europe. In addition, UC Davis is currently involved with a demonstration facility. The proposed allocation can be best used toward development of a pilot conversion technology facility.

Thank you for your consideration. Should you have any questions, please contact me at 909-592-1147.

Attach.

MIKE MOHAJER mikemohajer@yahoo.com P.O.Box 3334 San Dimas, CA 91773-7334 From: Mike Mohajer [mikemohajer@yahoo.com]

Sent: Saturday, August 12, 2006 2:12 PM

To: Margo Reid Brown; Jeffrey Danzinger; Rosalie Mule; Gary Petersen; Pat Wiggins

Cc: Mark Leary; Howard Levenson; Fernando Berton

Subject: August 15, 2006 CIWMB Meeting - Agenda Item 22 Emerging Technologies

Madam Chair and Members,

As a private citizen, I want to commend The CIWMB for the interest in conversion technologies even though the issue has been diluted by the staff report which labeled the subject matter as "emerging technologies." I have reviewed the staff report in re to the above captioned item and offer the following:

1. As indicated by staff, the CIWMB has been involved with the issue of conversion technologies since December 2000. Unfortunately, after six years of studies and the expenditures of several million dollars by the CIWMB, the findings and recommendations of the State Bioenergy Interagency Working Group, and the Governor's Executive Order S-06-06 issued on April 25, 2006, it is very discouraging to see the staff report which totally lacks any constructive proposal. The report recommends further studies, the safest proposal in a political arena.

As suggested by the CIWMB Member Cheryl Peace and others at the workshop held on July 27, 2006 at UCLA, I respectfully request that the CIWMB should move forward with formal adoption of the regulations for operation of conversion technology facilities in California. The development of the said regulations was begun by the CIWMB several years ago, and I do not see of any reason why it cannot be finalized by this fall. The said regulations must address only those issues under the purview of the CIWMB while avoiding duplication/encroachment into those areas under the jurisdiction of other governmental agencies.

2. Anaerobic digestion (AD) process is a composting technology that has been so recognized by the Legislature and the CIWMB for many years. Further, the CIWMB has formally made the determination that the process is eligible to receive full AB 939 diversion credit. The AD facilities have been in operation for many years in countries through out the Asia and Europe. Further, UC Davis is currently involved with a demonstration facility which is being publicly funded. Based on the foregoing, I believe that the \$200, 000 recommended by the staff to further study the AD process should be directed toward the development of a conversion technology demonstration facility.

Thank you for your consideration. Should you have any questions, please contact me at 909-592-1147

MIKE MOHAJER

mikemohajer@yahoo.com P.O.Box 3334 San Dimas, CA 91773-7334 Clean Technology for Renewable Energy

James L. Stewart Chairman of the Board

David Roberti, Senator (Ret.) President

Kay Martin Vice President

John Jensen Secretary & Chief Financial Officer September 7, 2006

The Honorable Margo Reid Brown, Chair, and Members California Integrated Waste Management Board 1001 "I" Street Sacramento, CA 95814

Subject: COMMENTS ON CONSIDERATION OF ALLOCATION PROPOSALS TO BE FUNDED FROM THE IWM ACCOUNT FOR FISCAL YEAR 2006/07 (ITEM 22, SEPTEMBER 12, 2006 CIWMB AGENDA)

Dear Chair Brown and Members:

In a letter dated August 11, 2006, the BioEnergy Producers Association (BPA) provided comments to the Board on a matter scheduled for your August 15, 2006 agenda entitled: "Request for Direction on Next Steps Relevant to Emerging Technologies" (Item 22). This item, which was pulled from the agenda prior to hearing, made a number of staff recommendations for the funding of 2006/07 programs.

Some of the same staff recommendations on which the BPA expressed concerns last month are now being presented as specific budget allocation proposals in the subject September 12, 2006 agenda item (Item 22). We respectfully request that further discussion and consideration of the policy implications of the following proposals be undertaken prior to action by your Board:

2006-D-2: Climate Change (\$500,000)

The BPA commends the CIWMB for its active participation in the Climate Action Team, and its efforts to identify ways in which advanced waste management strategies can contribute to the reduction of GHG emissions. The 2006-D-2 Allocation Request recognizes abatement of landfill methane emissions as a primary area of concern. However, we would urge reconsideration/revision of the scope of this study in the following areas:

- 1. The scope described in Attachment 1 to Item 22 addresses the GHG impacts of pursuing alternative diversion and processing options for "organics." Traditionally, the CIWMB has limited its "organics" definition to green and wood wastes, which make up only a comparatively minor portion of the total MSW stream going to disposal. If the purpose of the Board's effort is to reduce GHG precursors by diverting methane-producing materials from land disposal, then the scope must be expanded to include alternative technologies that can process all forms of biomass.
- 2. Two of the Board's three stated GHG reduction strategies are "increasing recovery of recyclables" and "implementing waste diversion programs to move towards zero waste." As suggested by the Board's earlier AB 2770 LCA studies, however, further data are needed on the specific cradle-to-grave emissions effects of various recovery and recycling activities, including the GHG impact of secondary materials exports and fugitive emissions impacting California from third world product industries.

2006-D-4 & -6: Biofuels Forum (\$50,000) & Anaerobic Digestion Pilot Project (\$200,000)

In our letter of August 11, 2006, the BPA noted that anaerobic digestion technologies have already been commercially validated, and currently enjoy both an established regulatory pathway and diversion credit eligibility. We again urge your Board to instead take a more active leadership role in promoting the development of commercial-scale conversion technology facilities in California, consistent with recommendations for the CIWMB in the Bioenergy Action Plan. Rather than sponsoring a conference to discuss "the feasibility of producing biofuels from solid waste," the Board should concentrate its resources on the creation of an enabling regulatory structure for bioindustry siting, in coordination with the Bioenergy Interagency Working Group, and in parallel with efforts in other states.

Respectfully submitted,

David Roberti, President

BioEnergy Producers Association

cc: Mike Chrisman
A.G. Kawamura
Jackalyne Pfannenstiel
Jim Boyd
Joe Desmond