CBA Symposium 9/18/13

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State Mandates/Goals by 2020

- 33% Renewable Energy
- 75% Recycling of Solid Waste
- Achieve 1990 levels of CO2 emissions
- 10% reduction in Carbon Intensity of transportation fuel
AD AND METHANE USE IN CA

- 238 Facilities in CA over 1 MGD
- 153 of those facilities have AD
- 94% of sludge in state is digested
- Only 9 > 5 MGD don’t digest
- 47 POTW < 5 MGD do digest
But Cross Media Issues Exist

- Regulatory Jurisdiction Disputes
- Legislative Initiatives
- Local Ordinances
- Clean Air Act Requirements
- Regulatory Initiatives
CalRecycle Jurisdictional Issue

- Organic waste into AD is increasing
- Supported by CEC, CPUC, SWRCB, CDFA, and CalRecycle
- Have been working with CalRecycle and SWRCB since ‘09 to resolve jurisdictional questions
- Finally near resolution!
Jurisdictional Authority Issues

- 2009 Document stated TS/PF permit would be at discretion of Local Enforcement Agency (LEA)

- CASA argued that POTWs are already regulated for this under water and air permits

- Patchquilt regulatory landscape creates unnecessary disincentive
Hauled in Organics for AD

- SWRCB NPDES/WDR permit language requiring SOPs, training, and tracking was developed

- CalRecycle included exclusion language in draft regulations as long as POTW is in compliance with this permit condition

- Revised draft regs released yesterday
Hauled in Organics for AD

- Expect initiation of formal rulemaking to be requested at October 15 CalRecycle meeting

- Expect Tom Howard (ED of SWRCB) to send letter to permittee’s requesting voluntary notification of Regional Board and SOPs

- CASA will develop SOP template and with SWRCB and CalRecycle will provide training
CDFA Rendering Rules

- First proposed regs in July 2010
- Could have considered POTWs as renderers if they accepted FOG
- CASA provided multiple written & verbal comments
- CDFA very responsive to comments
CDFA Rendering Rules

- Ongoing discussions ultimately resulted in exemption for POTWs
- Exemption and flexibility on how to quantify amount of FOG received was provided
- Regulations Became Final April 1, ‘13
- Next may consider slaughterhouse waste