

US EPA ARCHIVE DOCUMENT



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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 POTWs < 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