



Bay Area Biosolids to Energy

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February 6, 2014

Caroll Mortensen
Director, CalRecycle
1001 I Street
Sacramento, CA 95812

FEB 20 2014

Re: Comments on Feb 6 GHG Grant Program Workshop

Dear Director Mortensen,

On behalf of the Bay Area Biosolids to Energy (BAB2E) Coalition, I appreciate the opportunity to submit comments in response to CalRecycle's February 6 workshop on the development of new grant and loan programs for Greenhouse Gas (GHG) reductions from organics and manufacturing. We understand this workshop anticipates legislative approval of the Governor's plan to utilize \$30 million of Cap and Trade Revenues for waste diversion/greenhouse gas reduction activities.

The BAB2E Coalition supports the use of Cap-and-Trade revenue to reduce GHG emissions associated with the processing and disposal of organic materials. However, we believe CalRecycle should broaden its outlook to include more organic materials and more technologies, including conversion of biosolids to energy.

The proposed grant program for organics should specifically include biosolids; the energy-rich byproduct of wastewater treatment. Biosolids are currently hauled millions of miles to be land-applied as a soil amendment or disposed of in landfills. However, land application is politically sensitive and some counties are prohibiting the importation of biosolids from other counties. This will mean more landfill disposal of biosolids or even more hauling to jurisdictions willing to accept other counties' biosolids.

While technology is available to convert biosolids to energy or transportation fuel, it is not yet cost-effective for sanitation agencies to employ. Including biosolids as an eligible material under a new organics grant program would help ensure that new and less GHG-intensive solutions for biosolids management are developed.

Finally, while we understand that CalRecycle is working with a relatively small amount of funds, we suggest that the maximum grant award of \$3 million is too small. Projects funded by this program will in all likelihood be capital intensive. We believe the maximum grant award should at the very least be doubled to ensure that these valuable projects get off the ground.

Sincerely,


Paul Kelley
Executive Director

CC: The Honorable Jim Frazier

Coalition members: Central Marin Sanitation Agency, City of Burlingame, City of Livermore, City of Millbrae, City of Richmond, City of San Jose, City of Santa Rosa, Delta Diablo Sanitation District, Dublin San Ramon Services District, Fairfield-Suisun Sewer District, Ironhouse Sanitary District, Palo Alto Regional Water Quality Control Plant, San Mateo County Sanitation District, San Francisco Public Utilities Commission, Sausalito Marin City Sanitary District, South Bayside System Authority, Union Sanitary District, Vallejo Sanitation & Flood Control District, West County Wastewater District