

1 15 J



6075 Kimball Avenue • Chino, CA 91708
P.O. Box 9020 • Chino Hills, CA 91709
TEL (909) 993-1600 • FAX (909) 993-1983
www.ieua.org

May 5, 2015

Mr. Ken Decio
Waste Permitting, Compliance, and Mitigation Division
California Department of Resources Recycling and Recovery
P.O. Box 4025
Sacramento, CA 95812-4025
Fax: (916) 319-7244
Email: compost.transfer.regs@calrecycle.ca.gov

Subject: Comments on Proposed Revisions to Title 14 and Title 27 Regulations Regarding Compostable Materials, Transfer/Processing.

Dear Mr. Decio:

Inland Empire Utilities Agency and Inland Bioenergy, LLC are pleased to submit comments on the CalRecycle's proposed revisions to Title 14 and Title 27 regulations, on in-vessel digestion operations and facilities regulatory requirements.

In September 2010, Inland Empire Utilities Agency (IEUA), a municipal water district in in western San Bernardino County, entered into a public-private partnership with Inland Bioenergy (IBE), a California Limited Liability company, to operate the existing unused infrastructures at the Regional Plant No. 5 (RP-5) Solids Handling Facility (SHF), as a dedicated food waste digestion site. The project is currently being commissioned and will produce biogas generated from the anaerobic digestion process of organic material diverted from landfill. When operating at full production the facility will produce up to 3 MW of renewable electricity to be used at IEUA's water recycling plants.

We had the opportunity to review the revised proposed regulations, and we were pleased with the exclusion tier of anaerobic co-digestion material with POTW wastewater; furthermore, since the receiving and handling of the digestible material in the dedicated digestion process is exactly the same as in the co-digestion process, we believe that both co-digestion and dedicated digestion should be treated by CalRecycle in an equivalent manner under the proposed regulations. As a result, we propose the following language:

Page 34 - 17896.6(a)(6) "Other discrete handling activities that are already subject to equally stringent handling requirements under Federal or State law, as determined by the Department in consultation with the EA, are excluded. Furthermore, dedicated In-vessel Digester, including Large Volume In-vessel Digestion Facility operating at a POTW owned property, and receiving only hauled-in anaerobically digestible materials without co-digesting with wastewater, are exempt."

Thank you for the opportunity to comment and provide recommendations, we look forward to working with CalRecycle during the rulemaking process.

Sincerely,

Sylvie Lee P.E.
Manager of Planning & Environmental Resources
Inland Empire Utilities Agency

Niu Jinghui, P.E.
President
Inland Bioenergy, LLC

Water Smart - Thinking in Terms of Tomorrow

Terry Catlin
President

Michael E. Camacho
Vice President

Steven J. Elie
Secretary/Treasurer

Gene Koopman
Director

Jasmin A. Hall
Director

P. Joseph Grindstaff
General Manager