



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

August 19, 2009

Mr. Mark de Bie
Chief, Permitting and Local Enforcement Agency Support Division
California Integrated Waste Management Board
1001 I Street
P.O. Box 4025
Sacramento, CA 95814

Dear Mr. de Bie:

**Comments on Guidance Document on How Anaerobic Digestion Fits Current
California Integrated Waste Management Board Regulatory Structure**

Thank you for this opportunity to comment on the subject guidance document, which outlines the statutory and regulatory requirements for anaerobic digestion projects. Anaerobic digestion is a technology that has been used by the Sanitation Districts of Los Angeles County for decades in the treatment of biosolids at our wastewater treatment facilities. We support the expansion of this technology for the management of diverted organic materials where feasible. We are concerned, however, about the impacts on the existing regulations and, therefore, operations of anaerobic digesters at public-owned treatment works (POTWs) as a consequence of any new regulatory framework developed by that the California Integrated Waste Management Board (CIWMB). This should be carefully considered when any new regulation is proposed involving anaerobic digestion.

Anaerobic digestion is a proven technology at POTWs. The digester gas produced from the digestion process is collected and often beneficially used to generate electric power. This displaces the use of fossil fuels elsewhere to produce the same power, thereby contributing to achieving the greenhouse gas (GHG) reduction goals of AB 32. The guidance document (on page 9) indicates that if compostable wastes are added to biosolids undergoing anaerobic digestion at POTWs that activity would have another layer of regulation under Title 14 Section 17859.1. POTWs are already highly regulated by numerous agencies, so any new regulatory layer could hamper the development of new projects and impact existing operations at POTWs.

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Thank you for considering our comments. Please contact me at (562) 908-4288, extension 2723, should you have any questions.

Very truly yours,

Stephen R. Maguin

A handwritten signature in black ink, appearing to read 'Glenn Acosta', with a long horizontal flourish extending to the right.

Glenn Acosta
Senior Engineer
Facilities Planning Department

GA:ddg

cc: Mark Leary, Executive Director, CIWMB
Howard Levenson, Program Director, CIWMB