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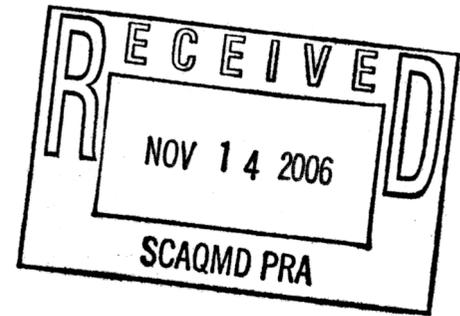
# CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

→ AQMP Admin  
Lee/Tracy



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November 9, 2006

Dr. Elaine Chang, Deputy Executive Officer  
South Coast Air Quality Management District  
21865 E. Copley Drive  
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JEFFREY DANZINGER  
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**RE: 2007 AQMP AND PROPOSED GREENWASTE COMPOSTING RULE**

Dear Dr. Chang:

ROSALIE MULÉ  
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I am writing about the Draft 2007 Air Quality Management Plan (AQMP) that the South Coast Air Quality Management District (SCAQMD) has issued, specifically the proposed emission reduction rule for green waste (MCS-04) composting in the AQMP.

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I appreciate SCAQMD's approach in the AQMP to this proposed rulemaking. As you know, our position is that the green waste composting industry is critical to the mission of the Integrated Waste Management Act (AB 939). Thus, I welcome the AQMP's provisions on page IV-A-84 regarding refining inventories, incorporating cost-effective BMPs, convening an all-stakeholder working group, and ensuring that implementation of this measure will not conflict with AB 939 efforts.

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CIWMB staff has examined the AQMP and supporting documents in more detail and has the following comments and suggestions, some of which reiterate the statements above:

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- The actual timeline for research and stakeholder meetings is unclear. On page 7-5, the AQMP indicates "2009/08" as the timeframe for Phase I. Is this a typographical error that should read "2007/08," or does the SCAQMD intend to initiate this activity in 2008?
- We recommend that NH<sub>3</sub> not be included in the SCAQMD's regulation of green waste composting based on our studies of NH<sub>3</sub> emissions at green waste composting facilities. In those studies, 98% of the data is "non-detect" for NH<sub>3</sub>, a finding that is backed up by other studies of green waste composting emissions (e.g., the Cedar Grove study).
- We reiterate our agreement with the AQMP's intent to incorporate technically feasible and cost-effective best management practices (BMPs) or controls, and emphasize the need to develop such alternatives rather than the expensive aerated static pile, biofilter, and enclosure options. In our view, the original conclusion of the SCAQMD during the development of Rule 1133 still stands, i.e., that these expensive types of controls would have "adverse impacts on the green waste composting industry." Given the importance of the green waste composting industry



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- to AB 939 diversion efforts, developing alternative controls for meeting emissions limits that are more cost-effective is of paramount importance. The CIWMB has been working on developing BMPs for green waste composting facilities that could help reduce emissions.
- The inventory of emissions being considered for this control measure, as reflected on page 4-19, needs to be re-evaluated because some facilities may have shut down since the Rule 1133 inventories were calculated. So far as CIWMB staff can ascertain, the inventories used in Rule 1133, which were developed several years ago, are carried forth in the 2007 AQMP. This is particularly true for VOCs and NH<sub>3</sub>.
- Page IV-A-83, last paragraph – a minor comment: organic materials account for over 30% of the California wastestream; also, recycling, reuse, and source reduction are not related specifically to that % but rather have been promoted to achieve the overall AB 939 diversion goals.
- Page IV-A-84, first paragraph – again a minor comment: the CIWMB has a contract with UC Davis to evaluate anaerobic digestion technologies, but not to examine green waste composting or associated emissions; also, our existing green waste composting emissions contracts are not studying PM and greenhouse gas emissions.

I also would like to reiterate our September 2006 comments regarding the process for this rulemaking. We strongly endorse the AQMP statement that "AQMD will convene a working group involving all stakeholders to develop cost-effective and workable solutions for this source category." We welcome an open public process that allows opportunities for multiple reviews and frequent stakeholder involvement.

In closing, I also would like to thank you for the cooperative nature of our working relationship on Rule 410. If an emission reduction rule for green waste composting is warranted and the CIWMB Board supports it, the CIWMB staff would again work cooperatively with the SCAQMD to develop a rulemaking that mutually serves the environmental needs of both agencies.

I would be happy to discuss these matters with you in more detail. Please feel free to call me at (916) 341-6311.

Sincerely,



Howard Levenson, Ph.D.  
Deputy Director, Permitting and Enforcement Division

cc: Margo Reid Brown, Chair, CIWMB  
Rosalie Mulé, Chair, CIWMB Permitting & Enforcement Committee  
Gary Petersen, Chair, CIWMB Sustainability & Market Development Committee  
Jeffrey Danzinger, Board Member, CIWMB  
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