



November 13, 2018

Mr. Steve Tsumura, Air Quality Specialist
Planning, Rule Development and Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Dear Mr. Tsumura:

Re: Comments on Proposed Rule 1118.1 – Non-Refinery Flares

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates this opportunity to provide comments on Proposed Rule 1118.1. SCAP represents 83 public agencies that provide essential water supply and wastewater treatment to nearly 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as recycled water and biogas.

Our members provide an essential public service by operating wastewater treatment plants for the sole purpose of safely and reliably managing society's sewage. Biogas is a by-product of the anaerobic sewage treatment process and must be managed continuously. This waste gas cannot be managed as a commodity, which is the objective of for-profit industries. Accordingly, our comments are focused on maintaining a safe and reliable method to manage biogas.

We would like to take this opportunity to recognize SCAQMD's efforts to address our concerns by restructuring proposed rule language. While we support the current concept of the rule and proposed limits, SCAP remains concerned that the October 31st version of the rule contains a number of outstanding issues that should be rectified. Our comments and recommended revisions are outlined in the attached redline/strikeout version of the rule. Some of these outstanding issues have the potential to materially alter rule requirements, so we respectfully request that an updated version of the rule be provided to stakeholders for a final review prior to the 30-day package deadline.

As illustrated in the attached comments, our members have relatively minor concerns pertaining to the major elements of the rule. Much of our angst has been alleviated by SCAQMD commitment to work with stakeholders and other regulatory agencies to holistically balance air quality requirements with the state-wide effort to divert organics from landfills as required under SB 1383. As we have discussed, our mission is to provide a public service by treating society's waste. With the recent

P.O. Box 231565

Encinitas, CA 92024-1565

Fax: 760-479-4881 Tel: 760-479-4880 Website: www.scap1.org Email: info@scap1.org

Mr. Tsumura

November 13, 2018

revelation that food waste diversion and advanced digestion processes could generate greater concentrations of ammonia, we need to ensure that major and minor source BACT remains achievable for essential public services. SCAP believes that new BACT determinations will be required for specific digestion scenarios, which may require increasing limits contained in the current generic BACT determinations for digester gas flares. Due to the importance of the technology assessment that will be described in the Governing Board Resolution for Rule 1118.1, SCAP respectfully submits the attached draft resolution for your consideration.

Thank you again for the opportunity to comment on Proposed Rule 1118.1. Please do not hesitate to contact Mr. David Rothbart of the Los Angeles County Sanitation Districts, SCAP Air Quality Committee Chair, should you have any questions regarding this transmittal at (562) 908-4288, extension 2412.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Jepsen".

Steve Jepsen, Executive Director

cc: Dr. Philip Fine, SCAQMD
Ms. Susan Nakamura, SCAQMD
Mr. Michael Krause, SCAQMD
Ms. Heather Farr, SCAQMD
Mr. Greg Kester, California Association of Sanitation Agencies
Mr. Ray Arthur, Central Valley Clean Water Association
Mr. Randy Schmidt, Bay Area Clean Water Agencies