



CLEAN WATER SoCAL
CREATING SUSTAINABLE SOLUTIONS

February 8, 2023

Mr. Mike Morris, Planning and Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Comments on Proposed Rule 1110.3 - Emissions from Linear Generators

Dear Mr. Morris:

Clean Water SoCal, formerly known as SCAP, represents over 80 public water/wastewater agencies in Southern California. Clean Water SoCal members provide essential water supply and wastewater treatment for approximately 20 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino, and Ventura counties. Clean Water SoCal's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastewater into resources for beneficial uses such as recycled water and renewable energy.

Clean Water SoCal appreciates the opportunity to provide comments on Proposed Rule 1110.3 - Emissions from Linear Generators (PR1110.3). While we understand the need to establish a source specific rule for linear generators, we remain concerned with the proposed emission limits for digester gas units (biogas) at wastewater facilities. In the absence of completed demonstration projects to verify the viability of the technology on biogas, we're concerned that the proposed emission limits in PR1110.3 will preclude wastewater facilities from pursuing this new technology using biogas. Our members are always seeking opportunities to beneficially use biogas at wastewater facilities in a way that utilizes sustainable and best available technologies, and we are encouraged by this new emerging technology. However, it should be demonstrated in practice while using biogas prior to establishing stringent emission limits in a source specific rule. Until such time, we believe that it is appropriate to adopt Rule 1179.1 biogas engine limits to biogas fueled linear generators.

Attached for your review and consideration please find proposed redline changes to PR1110.3. The proposed revisions essentially apply Rule 1179.1 biogas engine limits to biogas fueled linear generators until a technology demonstration on biogas units is complete.



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We appreciate you considering our comments and would be happy to meet to discuss in more detail. If there are any questions or concerns regarding this transmittal, please contact:

Alison Torres, Clean Water SoCal Air Quality Committee Co-Vice Chair torresa@emwd.org, or

David Rothbart, Clean Water SoCal Air Quality Committee Chair drothbart@lacsdsd.org

Sincerely,

Steve Jepsen

Executive Director – Clean Water SoCal

Cc:

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