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DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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California Energy Commission

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To whom it may concern:

**SUPPORT FOR INCLUSION OF SOLID WASTE CONVERSION TECHNOLOGIES IN
CEC ELECTRIC PROGRAM INVESTMENT CHARGE PROGRAM FUNDING
RE: DOCKET NO. 12-EPIC-01**

We are submitting the following comments for your consideration regarding the California Electric Program Investment Charge (EPIC). The California Energy Commission (CEC) administers a portion of the EPIC program, with the stated purpose of providing "funding for applied research and development, technology demonstration and deployment, and market facilitation for clean energy technologies and approaches." We would like to take the opportunity to share with you our efforts to evaluate and promote solid waste conversion technologies, and recommend their inclusion into the EPIC Program.

For the past decade the County of Los Angeles (County) has supported the development of conversion technologies as an alternative to landfills for disposal of post-recycled municipal solid waste (MSW). Conversion technologies are non-combustion thermal, chemical, mechanical, and biological processes that are capable of converting post-recycled residual MSW into useful products and chemicals, green fuels like ethanol and biodiesel, and clean renewable energy.

Facilities are successfully processing solid waste in 28 countries around the world, and projects are underway in the United States; however, no commercial facility has been constructed in California yet. The County has extensively evaluated various conversion technologies from around the world, and concluded that these technologies can fundamentally change the way we manage waste, diverting up to 100 percent of the waste from landfill disposal, producing significant quantities of renewable energy and biofuels from waste, preventing emissions – including greenhouse gas emissions – that otherwise would have been produced, and most significantly, creating high-tech green collar jobs.

The County would like to emphasize the following demonstrated benefits of conversion technologies:

1. **Conversion technologies create green collar jobs and spur the economy** - Conversion technologies would create a range of new, high-tech jobs and contribute to the local economy by creating new advanced infrastructure.
2. **Conversion technologies decrease net air emissions and greenhouse gases** - Conversion technologies have a simultaneous triple benefit to the environment: (1) reduction of transportation emissions resulting from long distance shipping of waste; (2) elimination of methane production from waste that would otherwise be landfilled; and (3) displacement of the use of fossil fuels by net energy (fuel and electricity) produced by conversion technologies.
3. **Conversion technologies produce renewable energy and green fuels, thereby reducing our dependence on foreign oil** - Conversion technologies produce fuel and/or energy. By utilizing conversion technologies, California and other States can develop clean, locally-produced renewable energy and green fuels, including ethanol, biodiesel, and electricity, which can be used to promote energy independence. Benefits from this independence include insulating residents from energy markets fluctuations, and avoiding environmental impacts associated with the extraction, refining, transportation, and combustion of fuels.
4. **Conversion technologies are an effective and environmentally preferable alternative to landfilling** - Based on reports developed by the California Department of Resources Recycling and Recovery (formerly the California Integrated Waste Management Board), the County of Los Angeles, and other independent agencies, conversion technologies are environmentally preferable to land disposal practices. Copies of the reports are available at www.SoCalConversion.org. Development of conversion technologies is needed now to provide decision makers with environmentally preferable and economically viable options for the management of post-recycled waste materials.
5. **Conversion technologies manage materials that are not practically recyclable and at the same time create an incentive to increase recycling** - Not all solid waste currently disposed can be recycled or composted. Contaminated organic materials, higher number plastics and other materials, which cannot be recycled or processed in an economically

feasible manner, are ideal feedstock for conversion technologies. At the same time, inorganic materials including glass, metals and aggregate have no value for conversion technologies, and therefore create an incentive to separate and recover those materials for recycling prior to the conversion process.

The growing consensus among scientists, regulators, environmental protection agencies, local government officials, residents, and businesses throughout California and the Country is that conversion technologies are a critically needed infrastructure to meet our long-term environmental and renewable energy goals while jump-starting the economy.

The County considers conversion technologies a potentially vital component of the EPIC program. However, in order for these technologies to successfully develop in California, it is important that an appropriate framework is established for regulating and permitting new facilities. We believe the CEC can play a vital role, through the EPIC program, to not only provide funding for these emerging technologies, but also to promote a clear permitting and regulatory framework that acknowledges MSW as a renewable resource since many technologies exist to recover energy, fuels, and other beneficial products from this waste stream in an environmentally protective manner.

It is also important to provide funding opportunities for "pioneer" conversion technology projects in order to pave the way for future project development. In addition to the funding support, grants and low-interest loans add credibility to a project, increases the public's awareness of such projects, and leverages investment from the private sector.

Thank you for the consideration of these comments. If you have any questions, please contact Mr. Coby Skye at (626) 458-5163 or by e-mail at cskye@dpw.lcounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

A handwritten signature in black ink, appearing to read "Pat Proano", written over a circular stamp or seal.

PAT PROANO
Assistant Deputy Director
Environmental Programs Division