Organic Waste Digestion Project Protocol Public Comments

TO: **Syd Partridge – Policy Manager, California Climate Action Registry**
FROM: **Adam Penque – Manager of Standards, GHGS**
DATE: **September 9, 2009**

SUBJECT: General comments on baseline performance standard and effluent volume monitoring.

Section 3.4.1 exclusion of wastewaters from breweries, ethanol plants, pharmaceutical production facilities and paper plants.

Comment:
It is not clear why the CAR OWD protocol should exclude any wastewaters from eligibility, provided that during verification it can be confirmed that the baseline management of these wastewaters was open lagoon management without gas collection. Any wastewater that IS managed under open lagoon conditions but is found to be ineligible would be a false negative for the performance standard and the protocol would fail at being a tool to mitigate those GHG emissions.

During the development of the "performance standard" it was identified that the aforementioned industries sometimes use anaerobic digestion as a means of wastewater treatment. It was not clear that a truly representative sample was taken to build an argument to exclude these waste types. In the United States wastewater management practices vary significantly with geography, laws, proximity to metropolitan areas, fuel and electricity prices etc. In order for CAR to exclude projects from eligibility an in-depth wastewater management analysis would HAVE to be done at a regional level to insure that the protocol was not unfairly excluding emissions from participating in the program. Similarly, some regions in the US may foster increased use of anaerobic digestion which would not have been evident in a national performance standard. As a result, a strong argument is made for evaluating projects on a case-by-case basis to determine baseline management. It is important to note that there is a difference between a performance standard used to determine additionally and one used to determine baseline management, (this letter does not advocate evaluating additionality on a case by case basis). It is not consistent to make project developers use a performance standard to determine if a particular industry is an eligible feedstock and then also require for eligible feedstocks that they prove that the waste was managed under anaerobic conditions on a case by case basis.

Also, it appears that the performance standard analysis did not examine if it is common practice for these industries to use anaerobic digestion onsite versus sending wastewater to an offsite

digester. It is entirely possible that the data would support the eligibility of these feedstocks for offsite digesters.

Proposed revision:
The OWD should subject all wastewater streams to the same strict baseline evaluation requirements to determine eligibility.   Upon verification, project developers would have to demonstrate on a feedstock-by-feedstock basis that the baseline wastewater management was uncontrolled anaerobic conditions (open lagoons). By doing so, the protocol would insure that only target feedstocks with eligible baselines would be credited. Any waste stream that had been going to an anaerobic digester (or any other ineligible management type) prior to the CAR program cut off date would be ineligible. For Greenfield projects where there was no prior wastewater management, project developers would have to demonstrate that it is common practice in the region to manage wastewater in uncontrolled anaerobic conditions.

Metering of digester effluent

The OWD protocol currently requires project developers to monitor (via a flow meter) the volume of wastewater entering and leaving the digester. It is recommended that CAR only require project developers to monitor the wastewater entering the digester and give developers the option of using this value for representing the discharge as well. The requirement for monitoring outflow adds additional monitoring equipment costs that can be over burdensome to the developer with out adding to the quality of the GHG accounting. Typically wastewater treatment plants have in flow and out flow volumes that are very close, by assuming that the outflow is the same as the inflow the calculations would conservatively assume that there are no losses (evaporation etc) during treatment. It is recommended that the protocol could give developers the option to either use inflow volumes to represent outflow or to monitor should they choose.