



February 26, 2007

Ms. Sandra Lowe-Leseth
San Joaquin Valley Air Pollution Control District
1990 East Gettysburg Ave.
Fresno, CA 93726

Subject: Draft New Rule 4565 Socioeconomic Impact Analysis Comments

Dear Ms. Lowe-Leseth

The California Association of Sanitation Agencies (CASA), Tri-TAC, and the Central Valley Clean Water Association (CVCWA) appreciate this opportunity to provide comments on the Socioeconomic Impact Analysis Proposed Rule 4565. CASA and Tri-TAC are statewide organizations comprised of members from public agencies and other professionals responsible for wastewater treatment. Tri-TAC is a technical advisory committee for the California Water Environment Association, CASA, and for the League of California Cities. The constituency base of CASA and Tri-TAC collects, treats, and reclaims more than two billion gallons of wastewater everyday and serves most of the sewered population of California.

The Central Valley Clean Water Association (CVCWA) is an organization of 57 local public agencies located within the Central Valley region that provide wastewater collection, treatment and water recycling services to millions of Central Valley residents and business.

Our primary concern is that there appears to be little of no scientific basis for your VOC emissions calculations. According to the Staff Report the VOC estimate is primarily based on odor studies at animal feed lots in Iowa. We first question the correlation of odors to VOC emissions with no scientific evidence to substantiate this. Second, we question the correlation between raw animal feedlot wastes with treated and tested sewage sludge or biosolids, again without any scientific justification.


Since the VOC emissions data is flawed, the cost per unit VOC reduction is also flawed.

We have not analyzed any of the other cost information except to note that the estimated tipping fee of \$45.00 per ton is not consistent with what is paid for a tipping fee in the San Joaquin Valley.

Thank you for this opportunity to comment on the Socioeconomic Impact Analysis for Proposed Rule 4565. Please do not hesitate to contact Layne Baroldi at 714-593-7456, or Bob Gillette at 916-565-4888 if you have any questions regarding this letter of our organizations.



Layne Baroldi,
Co-Chair,
Tri-TAC Land Committee



Charles V. Weir
Chair,
Tri-TAC



Robert A. Gillette
Biosolids Program Manager
CASA



Warren F. Tellefson
Executive Officer
CVCWA