
From: Dan Morash <dan.morash@calsafesoil.com>
Sent: Thursday, March 21, 2019 10:14 AM
To: ARB Criteria & Toxics Regulation Reporting
Subject: Comments on CTR

I agree with other comments that this process is moving too quickly, given the adverse impact it is likely to have.

I have one request, which is that when emissions are considered, they include emissions saved compared to the alternative treatment of the facility feedstocks (i.e., the avoided emissions cost). We recycle organics that would otherwise end up in a landfill and generate copious quantities of CO₂ and CH₄, among other hazardous gases (like H₂S). The organic fertilizer we make sequesters carbon in the soil. To accomplish these results, we consume natural gas to produce steam in permitted boilers. We are a net negative GHG producer. Under current regulation, we receive no benefit for that outcome. It now appears we may incur significant additional costs if we are required to report under these proposed new regulations. We have no way of knowing what the impact will be.

Best Regards,
Dan

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