SOUTH SAN FRANCISCO
SCAVENGER
COMPANY, INC.

March 26, 2021

Mr. Anil Prabhu
Manager, Fuels Evaluation Section
Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Response to Comments
Pathway Application B0123
South San Francisco Scavengers

Dear Mr. Prabhu:

South San Francisco Scavengers (SSFS) is providing responses to comments received following the California Air Resources Board's (CARB) public posting of SSFS's application for a Low Carbon Fuel Standard (LCFS) fuel pathway to produce renewable natural gas (proposed pathway number B0123). On March 9, 2021, CARB received one comment letter from Hammerschlag, LLC providing comments and/or questions in three different areas. SSFS's responses in each of these areas are provided in the sections below.

Comment 1 – The LCA Report is Incomplete

Hammerschalg commented that the LCA was missing or incomplete in the following bulleted items. Responses are provided after each bullet.

- Discussion and schematic of the system boundary per §95488.7(a)(2)(A)(1)

Figure II-1 in the LCA report presents the schematic of the system boundary and *Section II – Process Description* provides the discussion for the schematic.

- A detailed description of feedstock transport as described in §95488.7(a)(2)(A)(4)

Section 1 – General Information in the posted LCA report includes the following: "The organic waste is delivered to the site by the facility collection trucks. The waste is constituted of pre-separated organic fraction of MSW and food waste collected from households and commercial generators located in the South San Francisco, Millbrae, and Brisbane municipalities, as well as MSW collected from the San Francisco International Airport."

- A quantitative discussion of energy consumption as described in §95488.7(a)(2)(A)(7)

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An adequate identification and description of the thermal energy consumption used onsite is found in Figure II-1 in the LCA report and *Section II – Process Description*. The facility does use grid electricity, modeled as CAMX mix, where the invoices for this power were provided as part of the application documents. The only items not found in the LCA are the diesel loader and excavator that move material into and out of the digester. The specific calculation methods for these values can be found in item 9 of the Staff Summary Report – Operating Conditions.

- A more complete table of CA-GREET3.0 input values as required by §95488.7(a)(2)(B)(1)

The table in the file b0123_greet.pdf meets the requirements of identifying the input values for the CA-GREET calculator. Identifying specific energy consumption, feedstock amounts, or gas production would expose confidential business information.

- Addition of elements §95488.7(a)(2)(A)(3), (A)(6), (B)(3), (B)(4), (D), (F), and (G); or statements of their nonexistence when appropriate

The following sections identified by Hammschlag are not applicable for this application - §95488.7(a)(2)(A)(3), (D), (G). The following items are addressed below:

- §95488.7(a)(2)(A)(6) – Figure II-1 identified the CPL Boiler/Burner which is the main combustion powered piece of equipment. There is also a loader and excavator onsite at the facility that are used for RNG facility operations (they are also used for other non-RNG facility operations). As stated above, the specific calculation methods for diesel use for these pieces of equipment can be found in item 9 of the Staff Summary Report – Operating Conditions. An additional combustion devices file was separately provided with the required information.
- §95488.7(a)(2)(B)(3) – A modified version of the OW Calculator was used for this application and all GREET3.0 values used in the analysis are contained in the calculator.
- §95488.7(a)(2)(B)(4) – There were no additional LCA stage calculations, outside of calculating input values to the calculator, there were done outside of the modified OW Calculator sheet.
- §95488.7(a)(2)(F) - As stated at the beginning of *Section II - Process Description,* there is an EPA Engineering Report and is was submitted as part of the supporting documents for this application.

Comment 2 – Transport Emissions are Omitted

The SSFS digester facility is co-located with the Blue Line Transfer facility at 500 East Jamie Ct, South San Francisco. The transfer facility was operational and collected the same feedstocks along the same routes prior to the development and construction of the digester facility. The decision to exclude transport emissions from the carbon intensity, which was done in consultation with CARB staff, was since this feedstock was already being collected and transported along the same routes prior to the development of the digester resulting in the same driving (distance and diesel consumption) and diesel consumption

as before the digester. The dairy and swine manure calculator is an example where only the diesel use in addition to the baseline manure management/feedstock practices is considered in the carbon intensity.

Comment 3 – No Demonstration of Sustainability

Hammerschalg commented that "§95488.9(a)(1)(A) requires that when two pathways are based on "different inputs for the same feedstock-fuel combination processed within an operational data period at a single fuel production facility," a demonstration of substantiality is required. In this pathway there are two, not one, feedstocks being collected which negates the need for a substantiality determination. The two feedstocks are collected by separate truck routes and have the potential to vary month to month. By having two separate pathways, SSFS can more accurately allocate gas production between feedstocks if the feedstock ratios vary while if one pathway were developed, it would be quantified based on a fixed feedstock ratio which could result in over or under credit.

Sincerely,

Vinney Fornesi
Manager

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