

**Jeremy Loeb**  
California Air Resources Board  
P.O Box 2815  
Sacramento, CA 95812

Date: 3/13/2023

RE: Response to Public Comment on Application No. B0420 Tier 2 Pathway

Dear Jeremy,

A comment was submitted during the public comment period for Anew RNG, LLC's ("Anew") Tier 2 Pathway for Bio-CNG from landfill-diverted food scraps renewable natural gas at the Rialto Bioenergy facility in Bloomington, California for use as transportation fuel in vehicles. As authorized by §95488.7(d)(5)(A)(2), this letter provides a written response to the Executive Officer explaining why no revisions to the pathway application are necessary.

**Comment:**

*"In recent years it has become increasingly clear that biogas and natural gas facilities and equipment can leak, in which case the carbon intensity is much worse than the fossil-based fuel it substitutes for. To ensure that this does not happen, the facility in the application (and all facilities in biogas production), should be under heightened leak detection and repair protocols using frequent inspections and the best available technology, including infrared optical sensing or whatever car specifies as state of the art."*

**Anew's Response:**

The comment incorrectly suggests that the project is causing environmental harm when in fact the project is providing a benefit in terms of improved air quality and reductions in greenhouse gas emissions. For example, the *Tier 1 Simplified CI Calculator for Biomethane from Anaerobic Digestion of Organic Waste* by default uses a baseline 25% fugitive methane emissions rate for food scraps that would have otherwise been sent to a landfill. However, the alternative fate of food scraps sent to a digester project like Rialto Bioenergy, assumes only 1% of fugitive emissions rate under standard operating conditions.

Furthermore, the required operating permits demonstrate compliance with the applicable regulatory bodies. These permits were verified by the accredited third-party verification body and published to the public. In addition, the facility has a fire marshal approved methane detection system (General Monitors S5000 gas monitor) that can detect methane leaks in accordance with National Fire Protection Association 820 guideline for human safety.

Anew believes that no revisions to its pending application are needed and respectfully requests that the Executive Officer certify the pathway pursuant to §95488.7(d)(5)(B). Thank you for the opportunity to respond to comments on the pathway application.

Sincerely,



Scott O'Neill (Mar 22, 2023 14:55 CDT)

Scott O'Neill  
Head of Implementation & Operations  
Anew RNG, LLC.

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