

**CITY OF SAN DIEGO
MAYOR JERRY SANDERS**

July 17, 2008

California Resources Board, California Climate Action Registry and ICLEI
(policy@climateregistry.org)

Subject: Comments on Draft Local Government Operations Protocol (6/19/08)

From: City of San Diego, Metropolitan Wastewater Department
Thomas R. Alsbaugh, Senior Mechanical Engineer; Reviewer
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Please find our comments in the requested format below:

The City of San Diego owns three wastewater treatment plants, one of which is the advanced primary (with no secondary treatment) 240 million gallon per day Point Loma Wastewater Treatment Plant. Other large non-standard, low emission wastewater treatment plants also exist in the state. Most of our comments on Chapter 10 are to recommend the protocol acknowledge these large, non-standard wastewater treatment plants.

S/C #6.2.4, pg. 45,46:

Purchasers of “green power” should have the right to use Chapter 8 for the green power they purchase that meets the Chapter 8 requirements and where the data required for these calculations is available.

S/C #6.4, pg. 49,50, 51:

The section focuses on discussing and calculating heat produced in the form of steam. CHP systems frequently produce hot water as well as hot air and hot oil, etc. Occasionally the text says the words “(or heat)” or “heat (or steam)”. The protocol needs to cover all forms of heat recovery in a generic way.

Chapter 10 page 95 General:

The introductory paragraph acknowledges the existence of primary treatment (plants) but the subsequent discussions make an assumption all wastewater treatment plants are secondary plants and that all secondary plants generate N₂O at the levels indicated. Some WWTPs are unique and have de minimis process N₂O emissions and CO₂ emissions an

order of magnitude less than standard wastewater treatment processes. These processes should be encouraged by at acknowledging that alternative processes exist.

S/C # 10.2 page 96, clarify applicability of statements and tables:

1. 3rd pp first sentence after the word “wastewater” insert the words “in most secondary treatment processes”
2. Table 10.2, GHG Source Column, 4th and 5th rows down from title block, replace the words “Centralized WWTP” with “Standard Centralized Secondary WWTP”

Box 10.1 page 97 indicates “these methodologies will allow flexibility for wastewater treatment plant type” but no method to report lower emissions from significantly cleaner wastewater plants is made available. We suggest, at this time in the protocols development, that this statement be removed.

S/C #10.3.2, page 101:

First paragraph replace the words “Centralized WWTP” with “Standard Centralized Secondary WWTP” in line 1 and line 2.

S/C #10.3.2.2, page 102:

Change title to read: Process emissions from “Standard Centralized Secondary” WWTP without Nitrification/Denitrification.

Page 149 – Add term

Standard centralized secondary wastewater treatment plant:

A central wastewater treatment plant with secondary and possibly additional treatment, where the secondary treatment process utilizes air as its source of oxygen.

Thank you for allowing us to comment on this protocol .If you have any questions regarding these comments, please contact me at (858) 654-4493 or talspaugh@sandiego.gov.

Sincerely,

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Senior Mechanical Engineer

TRA/dl

cc: Alan Langworthy
Ann Sasaki