



# GAIA

Global Anti-Incinerator Alliance

GLOBAL ALLIANCE FOR INCINERATOR ALTERNATIVES

no-burn.org

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## DOCKET

### 06-OIR-1

DATE Dec 4 2006

RECD. Dec 5 2006

December 4, 2006

California Energy Commission  
Docket Unit  
Attn: Docket No. 06-OIR-1  
1516 Ninth Street, MS-4  
Sacramento, California 95814-5512

To Whom It May Concern,

I am writing on behalf of the Global Alliance for Incinerator Alternatives (GAIA) to comment on the Staff Issue Identification Paper: Implementation of SB 1368 Emissions Performance Standard. Please include these written comments in the public record.

GAIA considers gasification, pyrolysis, plasma arc and other high temperature thermal technologies to be forms of municipal solid waste (MSW) incineration.

The intent of SB 1368 is to reduce greenhouse gas emissions. The bill calls for the consideration of "net emissions" when determining the greenhouse gas emissions rate associated with electric generation. As such, the performance standard for implementing regulations should specifically address the net emissions for energy generated through the combustion of municipal solid waste. We recommend that the performance standard implementing regulations require a full life-cycle analysis for greenhouse emissions from the thermal treatment of MSW which includes the following:

- (1) Greenhouse gas emissions released from the thermal treatment of non-biogenic municipal solid waste materials such as plastics, synthetic rubber, synthetic fibers, and carbon black.
- (2) Greenhouse gas emissions released from the thermal treatment of unsustainable biogenic materials. This includes biogenic materials from resources that are harvested at a greater rate than they are restored globally causing a diminution of the carbon stock and additional CO<sub>2</sub> released into the atmosphere.
- (3) The embodied greenhouse gas emissions of municipal solid waste fuel sources. This includes greenhouse gases emitted by extracting and processing raw materials, turning them into products, transporting them to markets, and thermally treating them. The

construction of new incinerators requires one-time use and disposal of the earth's finite resources in order to meet minimum waste flow obligations, or "put or pay" contracts. These contracts and the high costs of incinerator technologies displace climate-friendly solutions such as waste reduction, recycling, re-use and composting, and cause substantial unnecessary full life-cycle greenhouse gas emissions.

(4) Avoided opportunities for greenhouse gas sequestration. The combustion of MSW displaces recycling, reuse and composting. Paper and food waste combusted avoids opportunities to reduce greenhouse gas emissions through forest carbon sequestration and/or soil carbon storage.

Please contact me at 510-883-9490 extension 102 or [dave@no-burn.org](mailto:dave@no-burn.org) for any clarifications.

Sincerely,

Dave Ciplet  
The Global Alliance for Incinerator Alternatives (GAIA), U.S. Office