Athens Services

Waste Collection·Recycling·Transfer·Disposal·Street Sweeping

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California Energy Commission
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California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Docket No. 12-EPIC-01 – Comments from Athens Services Corporation

To the California Energy Commission:

On behalf of Athens Services Corporation, we appreciate the opportunity to submit comment on the Electric Program Investment Charge (EPIC) Draft Triennial Funding Program.

Introduction to Athens Services

Athens Services has been providing waste collection and recycling services in Southern California for over 50 years. We are family-owned and operated, offering a variety of State-of-the-Art services, including automated waste and recycling collection, green waste recycling programs, organics waste composting, special waste transportation, transfer, materials recovery and other services.

- **Materials Recovery Facility (MRF)** . The Athens Material Recovery Facility is located in La Puente, near the industrial complex of City of Industry, and adjacent to the 605 and 60 freeways. This allows Athens Services to effectively service cities in Los Angeles, Riverside and Orange Counties. Our MRF was the first and only mixed waste processing facility in Los Angeles County when it began operating in 1996. It was expanded and improved in 2007 and is currently one of the highest-diverting mixed waste MRFs in Southern California. This state-of-the-art facility can process 5,000 tons of waste each day with virtually no noise or odor impact to the surrounding community. The operations for the MRF are fully enclosed and utilize forced air circulation with carbon filters to assist in odor control. Within our MRF, there exists a dedicated food waste

line to process and remove contaminates from organics before being delivered to our compost facility, American Organics in Victorville, CA.

- **Organics Facility**. The American Organics facility is located in Victorville, CA, at the VVWRA (Victor Valley Wastewater Reclamation Authority. Our compost material is **OMRI Listed®** (Organic Materials Review Institute) and approved to be used on "operations that are certified organic under the USDA National Organic Program." *OMRI* Our facility can process up to 700 tons a day of many types of organic materials, including food waste. Currently, we have specialized food waste collection programs setup in foodservice establishments and Municipalities throughout the Los Angeles, Riverside and San Bernardino County. American Organics processes the following types of organic material: Green Waste, Wood Waste, Dry Wall (clean), Sod, Chipped wood, Food waste, Manures, Non Hazardous liquids. American Organics can make a blend of compost to fit client needs, be it industrial, agricultural, municipal, residential and/or commercial.

- **Construction and Demolition Debris Facility**. Additionally, Athens has constructed a separate facility for the processing of construction and demolition debris. Our C&D facility diversion is certified and rated as one of the highest in the Los Angeles area. The materials can be characterized to evaluate a project's diversion rate and ensure compliance with sustainability and LEED® objectives.

- **Planned Facilities**. Athens continues to look to the future with respect to increased diversion technology and landfill avoidance; currently there are two additional material recovery facilities in the planning phases. The proposed Sun Valley location will be LEED certified and solar powered.

Athens Services, Inc. Comments on the Proposed Triennial Funding Program.

Regarding the EPIC Funding Program, we have carefully analyzed it and strongly support the allocation of funding to the following Program Areas:

1. We very much appreciate the allocation of twenty-percent (20%) of the EPIC Proposed Triennial Investment Plan for bio-energy activities. Athens Services is committed to the success of this program, and would offer to serve on a Bio-Energy Advisory Group for this project. We understand that this will be approximately $27 million per year for technology demonstration and deployment projects.

2. Athens Services' detailed comments on each applicable specific funding area of the EPIC program are provided on the following pages:

A. S3.2. Develop Innovative Technologies, Techniques and Deployment Strategies to Accelerate Commercialization of Sustainable Bioenergy Systems

Athens Services will be pleased to participate in this program. We can support the program in the following ways:

- Depending upon the specific research project, the Athens Material Recovery Facility in the City of Industry, California could be occasionally used as a research or demonstration project location. This is an active material recovery facility, with considerable use of each portion of our facility. However, we recognize the benefit to the Energy Commission of well-located potential demonstration sites, and will carefully consider any potential projects suggested.

- As discussed in the Company Overview, Athens Services has other facilities, presently in operation or planned for the future, which could be site-specific research or demonstration project locales. All communities in our service area are looking for new ways to generate jobs, particularly in fields which will yield higher income levels. We would welcome the opportunity to suggest and organize research projects at these planned facilities, possibly in association with local colleges and universities.

- Athens Services has developed extremely sophisticated scheduling and logistics software and methodologies for our operations regionwide. Our logistics staff may be valuable in helping to assess the complex biomass reuse optimization and scheduling requirements to support smaller local biomass processing operations.

B. S5.1 Strategic Initiative – Air Quality Research to Address Environmental and Public Health Effects of Conventional and Renewable Energy and to Facilitate Renewable Energy Deployment

Athens Services will support any program elements of this Strategic Initiative which are applicable to its current or planned operations.

C. S9.4 Proposed Funding Initiative - Develop Advanced Recycling Technologies and Processes for Recycling Plug-in Electric Vehicle Batteries

This task is extremely applicable to Athens Services core base of expertise. As new products and technologies evolve, Athens Services is at the forefront of designing and managing new recycling processes for them. We are familiar with all current regulations and methodologies for all aspects of this task, and will be pleased to participate.

D. S10. Strategic Objective. Leverage California's Regional Innovation Clusters to Accelerate the Deployment of Early-State Clean Energy Technologies and Companies

Athens Services is well located geographically, and from a client standpoint, to participate and bring benefit to a Bio-Energy-related Regional Innovation Cluster. The San Gabriel Valley, where Athens Services is located, has one of the largest concentrations of colleges, universities and research institutions in California. The businesses of the San Gabriel Valley are highly organized in effective business groups such as the San Gabriel Valley Economic Partnership. Many of the largest engineering firms in the world are headquartered or with major offices in the San Gabriel Valley, such as Parsons, Jacobs Engineering, Tetra Tech, and MWH Global, all of which are involved internationally in the bio-energy field. This is important because the technologies developed within the Energy Commission's program will ultimately have to be acceptable to these engineering firms and their clients.

In addition, many of Athens Services clients are among the world's top research institutions, such as the California Institute of Technology and NASA Jet Propulsion Laboratory. These organizations have ongoing research projects underway, which can be coordinated through the Energy Commission within the Innovation Cluster. Through JPL and Caltech, the full range of federally-funded research in bio-energy can be accessed.

Within the S10.1and S10.2 elements of this program, specific to "biomass-to-energy", Athens Services can be a teaming partner with firms developing new technologies. In addition to our own operations as discussed above, we have strong relationships within the business community that may be valuable to support these entrepreneurs and projects at an early stage, under the auspices of the Energy Commission's program.

E. S12.1. Proposed Funding Initiative – Demonstrate and Appraise the Operational and Performance Characteristics of Pre-Commercial Biomass Conversion Technologies, Generation Systems and Development Strategies

Athens Services has the full resources as described above to support all aspects of this program task. This includes ongoing major involvement with the dairy industry and their waste streams, and programs involving anaerobic digestion to product new products. For example, Athens Services is currently seeking technological synergies for treatment and use of high BOD liquids and composting of solids.

In addition, Hon. Joe Baca, Congressman in 43th District, located in the San Gabriel Valley, serves on the House Agriculture Committee. His office has followed the EPIC program closely and will be supportive of program research activities at the federal level.

F. S14 – Strategic Objective – Collaborate with Local Jurisdictions and Stakeholder Groups in IOU Territories to Establish Strategies for Enhancing Current Regulatory Assistance and Permit Streamlining Efforts that Facilitate Coordinated Investments and Wide-spread Deployment of Clean Energy Infrastructure

Athens Services works closely with local jurisdictions and stakeholder groups, particularly in the Southern California Edison IOU territory. We provide our services to more than 35 cities in the

Los Angeles and Orange County areas of Southern California. We also have active working relationships with most stakeholder groups involved with the bio-energy sector throughout the region. Therefore, we are able to support these program tasks in a comprehensive manner.

G. S15 – Strategic Objective – Strengthen the Clean Energy Workforce by Creating Tools and Resources that Connect the Clean Energy Industry to the Labor Market.

Athens Services strongly believes in a well-prepared workforce, and has an active mentoring and recruitment program in place for our own workers. We envision a program which would closely coordinate with the California Community Colleges and their Workforce Training Programs to co-develop a bio-energy workforce training program. In our service area are more than twenty community colleges, through which such a program could be implemented.

Summary Comments

Athens Services is committed to involvement within the California Energy Commission EPIC program. We welcome a dialogue with the CEC once this Triennial Funding Program is finalized, to determine how we can best contribute to the EPIC program success.

Sincerely,

Greg Loughnane

Executive Vice President