

November 2007

**A Special Message from the Executive Director:**

All of us at SCAP wish to offer our deepest sympathy and condolences to those of you who may have been displaced because of the recent wildfires raging throughout Southern California. I have seen my share of disasters (this being the second time that I've faced evacuation orders) but I have never before seen this magnitude of destruction. Through the heroic efforts of our firefighters, law enforcement personnel and public agency staff, countless lives and infrastructure were saved. We all owe a tremendous debt of gratitude to these people and to the generous volunteers that have provided support to the fire victims.

**A Message from the Executive Director...**

I have come to the realization that things just aren't the way they used to be. Way back in high school, I remember heading to the beach with my friends loaded into the back of my old '54 Ford pickup. It was not very fancy really, the windows rolled up with a handle, it had a starter button, there were no seat belts and the motor actually had a carburetor. However, it did have a gun rack in the back window, where I always kept my shotgun while I drove around town. I'm not sure if I could get away with doing that today. Those were the days when we drank from the garden hose, siphoned gasoline into a can using a plastic tube and even picked up hitchhikers. Boy, have things changed. But now that I think of it, maybe they changed for the better. After all, seat belts save lives, not riding in the bed of a truck probably prevents passengers from becoming human missiles and as far as picking up hitchhikers goes.... need I say more.

I guess one could say that laws are made sometimes to protect us from ourselves. Take AB32 for example. While it's somewhat controversial, I think we can all agree it is in everyone's best interest to protect our precious Mother Earth. However, as laudable as the state's Global Warming Solutions Act may be, the legislation is indicative of the state's current passion for thinking green. Implementation of California's global climate change goals may be easier to achieve than assuring clean and plentiful water flows from the kitchen

**Upcoming Meetings**

**SCAP 2007 Fall Board Management Workshop on AB32 Issues** – Monday, November 5<sup>th</sup>, 9 a.m. -12 noon at IEUA.

**SCAP Board of Directors Meeting** – Thursday, December 6th, 9:30 am– 11:30 am at El Niguel Country Club.

**13<sup>th</sup> Annual SCAP Holiday Luncheon** – Thursday, December 6th, 11:30 a.m. at El Niguel Country Club. Reservations are required. You don't want to miss this event!

tap, wastewater gets properly treated and highways keep traffic moving. While many Californians are acutely aware of water shortage issues and witness daily problems on our streets and highways, few realize how staggering the state's total infrastructure deficiencies are. It seems to me that a practical balance of green initiatives and solving the state's infrastructure woes needs to be addressed in order to accommodate another 25 million people. Wasn't it just a year ago that ASCE released their California infrastructure report card and awarded the State an uncomplimentary grade of "C-?"

Municipal managers driven by the need for operational efficiencies and cost-savings have been moving in this direction long before being "green" was in vogue. Using low-to-zero emission turbines and fuel cells, converting over to natural gas powered vehicles and going off the grid by powering operations with electricity generated by recaptured methane gas, is old hat in the water/wastewater sector. These pre-green actions underscore a key point known for decades by our municipal agencies – green gains momentum when it produces bottom line business results. To achieve sustainability, projects need to incorporate these three factors: economic, technical and environmental. Many agencies across the world already subscribe to a similar strategy in measuring their organizational successes using the Bottom Triple Line method of reporting. Demanding that California infrastructure projects integrate these requirements forces a focus on progressive, practical solutions to achieve more value with less impact on resources.

Now is a good time for our legislators to consider a comprehensive and long term mindset when thinking green that includes addressing our state's equally vital infrastructure systems deficits. A bias toward "least action" needs to be replaced by consideration for the "best action." The real triple bottom line for California should be an effective and green movement that includes a functional state-of-the-art infrastructure core.

Infrastructurally yours,

John Pastore

## **Air Quality** by Chair Daniel McGivney

### **Meeting with Orange County Supervisor Bill Campbell**

A meeting with Orange County's Third District Supervisor Bill Campbell took place on October 29<sup>th</sup>. In attendance were SCAP Air Quality Committee Chair Dan McGivney, SCAP Air Quality Committee Vice Chair Greg Adams, OCSD's Air Quality Committee representative Vlad Kogan, SCAP Regulatory Consultant Mary Jane Foley and SCAP Executive Director John Pastore.

The meeting was intended to advise Supervisor Campbell, a SCAQMD Board Member, on the following SCAP positions relative to SCAQMD’s Proposed Amended Rule (PAR) 1110.2 and PAR 1309.1.

Proposed Amended Rule 1110.2

SCAP’s Position: Considering the current issues of climate change, global warming and greenhouse gas emissions, maximizing use of alternative renewable fuels and minimizing the importation of fossil fuel generated energy, the use of bio-fuels (digester and landfill gas) should not be discouraged nor be disadvantaged. Use of biogas fuels increases energy efficiency and California’s portfolio of renewable fuels, minimizes the importation of fossil fuel generated power and lowers emissions of GHGs from the use of fossil fuels. The SCAQMD should encourage the maximum productive use of biogas. Instead, the SCAQMD’s current proposal will not only discourage uses of biogas, but may completely disallow some or all future Co-Gen projects.

<p><b><u>Committee Chair Contact Info</u></b></p> <p><b>Air Quality Chair:</b> Dan McGivney – <a href="mailto:dmcgivney@emwd.org">dmcgivney@emwd.org</a></p> <p><b>Biosolids Chair:</b> Karen Soares – <a href="mailto:ksoares@lacsdsd.org">ksoares@lacsdsd.org</a></p> <p><b>Collection Systems Chair:</b> Ralph Palomares – <a href="mailto:RPalomares@etwd.com">RPalomares@etwd.com</a></p> <p><b>Water Issues Chair:</b> Gus Dembegiotes – <a href="mailto:Gus.Dembegiotes@lacity.org">Gus.Dembegiotes@lacity.org</a></p>
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- BARCT to BACT Retrofit for Biogas Engines requires minimum 90% Biogas component or must meet Natural Gas BACT Standards as early as 2010, which is when SCAQMD Biogas Technology Assessment is to be completed.
  - SCAQMD is allowing POTWs to request lower mix if they can demonstrate must flare gas;
    - In some cases, this may be possible (typically where the biogas fueled engine is being used for a mechanical driver [aeration blower, effluent pump, etc.]); however, staff has also indicated that it may want to understand why an agency can’t use other technologies like micro-turbines, boilers, fuel cells, etc.;
    - Where engines are used for power generation, SCAQMD is stating that the agency should shut down the engine and obtain power from the grid;

SCAP Proposal: Modify requirement to be based upon 75% Biogas component until Technology Assessment is completed in 2010 when the Rule may be re-opened for Amendment.

- Use of biogas benefits the environment as applicable to Climate Change and production of Greenhouse Gases;
- Biogas is a renewable fuel and should be given preferential treatment when compared to non-renewable fuels;
- There are many engines out there right now that will not be able to attain the 90% requirement. This could force them to implement non-biogas favorable projects in order to meet the BARCT to BACT standards early and before the completion of the technology assessment. Or, it could force an agency to

choose to implement an unproven technology early that ultimately may not prove out, thereby wasting a public investment.

- We are just asking for some consideration during the interim while the assessment is being done and current and proposed projects evaluating lowering emissions from biogas engines are implemented and evaluated.
- New Proposed Emission Limits for Distributed Generation (affects New Installations only)
    - These emission limits cannot currently be attained by natural gas fueled engines;
    - Biogas engines will struggle to meet the current BACT Standard, much less attain emission limits that even natural gas engines cannot attain;
    - The same 90% Biogas component threshold is applicable here for New Biogas Co-Gen Projects;
    - Again, the SCAQMD will consider granting a different fuel gas mixture ratio if they can demonstrate must flare gas
      - Once again however, the District is pushing for us to shut down biogas fueled power generation and go to the Grid when we cannot attain the 90% Biogas Fuel Mixture Standard
      - The Technology Assessment will currently only evaluate biogas engines meeting current BACT not the proposed DG Standards

SCAP Proposal: Remove DG Standards applicability to Biogas Projects

#### Proposed Amended Rule 1309.1

Pertaining to Rule (PAR) 1309.1 – Priority Reserve, it is SCAP's position that all publicly owned but privately operated biosolids facilities should qualify for free Priority Reserve offsets. It is SCAP's position that contracting out operations of publicly owned biosolids facilities to private entities is, in some cases, a cost effective measure that many local governments frequently employ.

#### **2007 Fall Board Management Workshop on AB 32 Issues – November 5, 2007**

The SCAP Air Quality Committee will be conducting an informational workshop on Monday, November 5, 2007, at the Inland Empire Utilities Agency that will cover numerous topics related to climate change and its impacts from AB 32 on our wastewater agencies. This should be a great opportunity for our managers and senior level staff to stay abreast of the ever changing regulations associated with green house gases. Topics that will be included are: Climate Change Background; Status of Legislative and Regional Efforts Related to Climate Change; Mandatory and Voluntary Report for AB 32; Pending Actions Related to Climate Change; Opportunities for Offset Credits from Water Reuse Projects; and The Effects of Climate Change Early Action Measures on Biosolids Reuse.

**Biosolids** by Chair Karen Soares**Kern County**

Judge Gary Feess will soon decide whether Kern County must reimburse the plaintiffs (POTWs and biosolids contractors) for approximately \$1.9 million in attorney fees that they incurred in the court case that overturned Kern County's Measure E in August 2007. Kern claims that they should not have to reimburse the plaintiffs for attorney fees, pending the outcome of their appeal to the 9<sup>th</sup> Circuit Court of Appeals in San Francisco. Judge Feess was supposed to rule on the issue of fees on October 15<sup>th</sup>, but has now delayed the hearing for another two weeks.

**CIWMB Organics Summit**

On October 10<sup>th</sup>, the California Integrated Waste Management Board held an all day "Organics Summit" to collect input from stakeholders on the direction of the CIWMB's organics management strategy, and the Board's "Strategic Directive" to achieve a 50% reduction of organics in the state's waste stream by 2020. According to the CIWMB, approximately 23 million tons of compostable organics, wood, and paper are landfilled annually in California, and 2.6 million tons (mostly green waste) are used as alternative daily landfill cover (ADC). In the future, some portion of this might be composted instead of landfilled, and it is still uncertain what impact this would have on existing biosolids composting facilities and current compost markets. The Biosolids Committee is following this closely to ensure that any future regulatory changes do not impact landfilled biosolids or biosolids use as ADC. The CIWMB will soon release a summary and action plan from this Summit, tentatively at its December board meeting.

**California Research Bureau (CRB) Report on Biosolids**

CASA has submitted a comment letter to the CRB, challenging many aspects of the report, which was generally biased against biosolids land application. The comment letter is available on CASA's web site at <http://www.casaweb.org/documents/10-12-07-Letter.pdf>. For a copy of the actual 94-page CRB report, go to: <http://www.library.ca.gov/crb/crbsearch.aspx>

**AB 32 Early Action Measures**

ARB has released its Draft Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions, and two of the 44 measures relate to biosolids reuse options used by SCAP members.

Cement kilns are being required to implement energy efficiency, which may include the use of carbon-neutral fuels such as dried biosolids and EnerTech's E-fuel. A group of sanitation agencies and CASA met with cement industry representatives in January 2006 to discuss the feasibility of using dried biosolids to fuel cement kilns, and these talks will likely continue. Seven kilns are located in Southern California, mainly in the high desert. The second measure calls for Collaborative Research to Reduce GHG Emissions from Nitrogen Land Application, and if

studied, biosolids and compost could potentially be shown to have lower impacts than chemical fertilizers.

Another measure, to adopt statewide air quality rules for compost sites (like SCAQMD R1133 and SJVAPCD R4565), was considered by the ARB but was rejected. In their evaluation, ARB staff determined that “composting may be considered a method of carbon sequestration and therefore a potential offset measure,” and “compost usage can reduce fertilizer requirements by at least 20 percent, thereby significantly reducing net GHG emissions.”

For the complete list and description of each of the 44 Early Action Measures, see [http://www.arb.ca.gov/cc/ccea/meetings/ea\\_final\\_report.pdf](http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf)

### **Mojave Desert Air Quality Management District, Compost Rule**

At its October 22<sup>nd</sup> board meeting, the Mojave Desert AQMD (MDAQMD) released their technical report entitled “Health and Safety Code 39614 Feasibility Analysis for Composting and Related Operations.” The MDAQMD recommended adoption of a best management practices rule for composting, including a contingency measure for “add-on control technology” that would be triggered by a non-attainment designation of the MDAQMD for the federal PM<sub>2.5</sub> ambient air quality standard by US EPA. The best management practices rule, if adopted, would apply to the planned Nursery Products composting facility. The 40-page technical report can be found (starting on page 33 of the agenda) at the following link:

<http://www.mdaqmd.ca.gov/cob/agenda.pdf>

### **Collection Systems** by Chair Ralph Palomares

Well, fall's upon us and when I quoted in last month's newsletter that the Santa Ana winds would be here, little did we know what would happen when they did arrive in Southern California on October 20<sup>th</sup>. FIRESTORM: My sister's house in Malibu was spared again but it's only a matter of time as those winds will be back. Some of you may have lost, or know someone who lost, a home or some type of property in this latest fire. Our hearts go out to you and your families. I assisted the American Red Cross at the El Toro High School relief center and there were a few times that I couldn't keep back the tears. There was an older woman that I remember who received a phone call and just started crying; it turns out she lost her home in Fallbrook. What I learned was to always have a disaster plan in place for families and a meeting point in case we are all not together when disaster hits us. I have read that a lot of water and sanitation agencies lost pump stations and other buildings due to the fire and had to find other ways to boost water pressure or just plain didn't have the water resources to operate. I hope in the near future these incidents are shared with the industry so that we can all learn from this latest disaster and try to prevent it from happening again.

**Collection Systems Committee Meeting – October 22, 2007**

Our SCAP Collection Systems Committee meeting on October 22<sup>nd</sup> at the IRWD Duck Club went ahead as scheduled. Only a handful of about 15 showed up due to the fire. We discussed the ongoing flushable wipes ragging issue and where it stands. It has been decided that we should take our time with this and get support from the other groups out there who are also interested in this issue. Then proceed from there with a letter to the manufacturers with support from the wastewater industry. On the calcium pipe issue, the NCPI is working on a solution that involves the use of a mild acid that will soften the calcium up, making it easier to clean off of the clay pipes. NCPI will be performing a test here some time soon and I will report more on this next month. One other new topic of discussion was a chemical root killer with copper sulfate that is banned in many Northern California cities and whether it should be banned here in Southern California due to the high copper levels already existing in our treated wastewater. The FOG container issue was discussed and will be brought up at a later meeting when we have more information back from the waste haulers and the sanitation agencies, as well as the odor control issues that we all face today.

The sewer lateral ownership survey that I'm preparing is coming along. If you haven't sent me your program yet, please do so at your earliest convenience so that I can complete this soon. Future SSMP classes were discussed. If you have any photos of some type of problem or a piece of equipment that you would like to share with us, please send it to Kris at SCAP. Legislation updates were also discussed including AB 800, S 2080, and HR 2452. These will be discussed more at the next SCAP Collection Systems Committee meeting when we have larger attendance and, hopefully, no disasters going on.

It has been a pleasure being the SCAP Collection Systems Committee Chair this year and I would like to thank the SCAP staff, Collection Systems Committee Vice Chair Sam Espinoza, SCAP Executive Director John Pastore and the SCAP Board of Directors for supporting us. Also, a big thank you to Kris at SCAP and Bob Kreg and Nick Arhontes for their assistance at the SCAP collections meetings. We hope to see you all at the next SCAP meeting in January 2008. Have a Happy Holiday Season 2007 and remember to always visit the SCAP website for more information.

**Water Issues Committee** by Chair Gus Dembegiotes**Proposed Statewide Water Recycling Policy**

On September 13th, the State Water Resources Control Board (State Water Board) released its proposed statewide Water Recycling Policy. The State Water Board held a workshop to discuss the proposed policy on October 2nd in Los Angeles at the Metropolitan Water District. Written comments on the policy were due to the State Water Board by October 26th. The State Water Board has also scheduled a hearing on December 4th in Sacramento to consider adoption of the policy and a related CEQA document.

As noted last month, the purpose of the statewide policy was to provide direction to the Regional Water Boards on how to interpret state statutes, regulations, plans, and policies with respect to water recycling projects, thus ensuring consistent interpretation of the requirements and encouraging the use of recycled water. The policy as released had several provisions that were of concern to suppliers and producers of recycled water. Two of the more controversial provisions in the draft were the limitation on TDS and the financial liability provisions. The policy as written would limit TDS to the TDS in source water plus 300 mg/l, unless a salt management plan were in place. The other provision which has sparked much discussion dealt with financial liability.

The proposed policy can be reviewed at:

[http://www.swrcb.ca.gov/comments/docs/water\\_recycling\\_policy.pdf](http://www.swrcb.ca.gov/comments/docs/water_recycling_policy.pdf)

The public notice can be found at:

[http://www.swrcb.ca.gov/comments/docs/water\\_recycling\\_policy\\_notice.pdf](http://www.swrcb.ca.gov/comments/docs/water_recycling_policy_notice.pdf)

**Proposed Sediment Water Quality Objectives**

The State Water Resources Control Board (State Water Board) has released its long awaited proposed Water Quality Control Plan (Plan) for Enclosed Bays and Estuaries of California, Sediment Quality Objectives. A hearing has been scheduled for November 19th in Sacramento to receive comments on the proposed plan. The notice for the meeting states that the State Water Board will not take any action at this “hearing” but will at a subsequent noticed meeting. In 2003, it initiated a program to protect enclosed bays and estuaries through the development of sediment quality objectives (SQOs). The SQOs use a multiple line of evidence that integrates the chemistry, toxicity, and condition of the benthic community to determine the health of the sediment.

<p><b><i>Congratulations this month go to:</i></b></p> <p><b>Otay Water District</b></p> <p>The Otay Water District’s (Otay) Information Technology and Strategic Planning Department has won the highest award granted by the Municipal Information Systems Association of California (MISAC). Otay is one of only a dozen cities and special districts in California to receive the “Excellence in IT Practices Award” for 2006-07.</p>
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The draft Staff Report and proposed Plan may be obtained at:

<http://www.waterboards.ca.gov/bptcp/sediment.html>

Comments need to be submitted to the State Water Board no later than 12 p.m. on November 16, 2007.

Agency Profile**South Orange County Wastewater Authority (SOCWA)**[www.socwa.com](http://www.socwa.com)**Snapshot:**

- Headquarters: Dana Point  
Service area: 220 square miles  
Organization: Joint Powers Authority  
with ten member agencies  
Employees: 64  
Treatment Plants:
- Regional Treatment Plant (RTP) – 12 MGD Capacity
  - Jay B. Latham – 13 MGD Capacity
  - Coastal Treatment Plant – 6.7 MGD Capacity
  - Plant 3A – 6 MGD Capacity



Drought and increased demand for recycled water are driving planning for a new recycled water facility that has been under consideration for 20 years at South Orange County Wastewater Authority's (SOCWA) Jay B. Latham facility.

"Adding the facility hadn't been an issue until the last few years," said Tom Rosales, SOCWA general manager. "The City of San Juan Capistrano is a big proponent of the project because they have no recycled water and are interested in bringing it into their area."

If the new facility is approved, it will add another 7 million gallons of recycled water to the authority's current 20 million gallon capacity. The authority has secured \$5 million of Proposition 50 funds and the remaining funding for the \$27 million project would come from three member agencies: San Juan Capistrano, Moulton Niguel Water District and South Coast Water District.

Rosales said the additional recycled capacity would be welcome. "During the summer months at one of our regional treatment plants virtually all the 11 million gallons that comes in is recycled and put to use by Moulton Niguel," he said.

In addition to planning for new recycled water capacity, Rosales said the authority is focused on a \$90 million capital improvement program.

“Like everyone else we have aging facilities with some portions more than 30 years old,” he said. “Over the past 5 years we have really stepped up rehabilitation programs.”

The program is centered on a 10-year moving plan, which is updated every two years for the next 10-year period. The engineering department prioritizes projects based on a model it developed that takes into consideration whether a project is environmentally driven, regulatory driven or age driven.

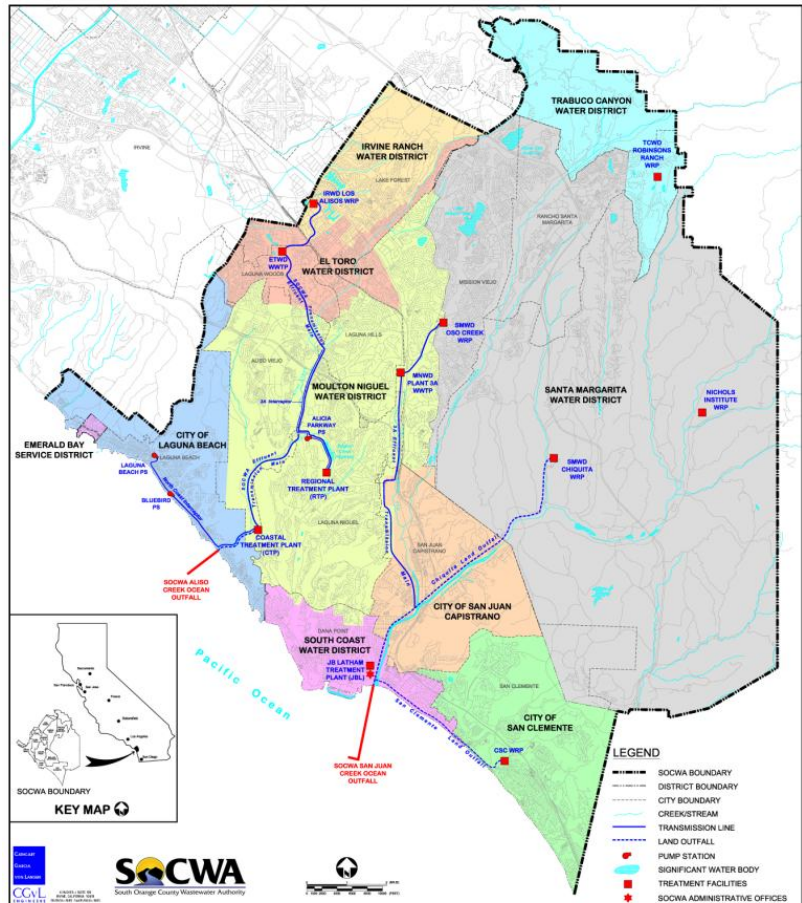
“When the engineering committee meets each month, a dominant part of the discussion is where projects are on initial scope and dollars spent,” Rosales said. “The result is we have been very consistent with the numbers since they first came out and we’ve been successful at “smoothing out” the numbers for our member agencies who have invested in the capital projects. This is important because it helps our member agencies work with stable numbers when they have to set rates.”

Another current issue is a proposed AQMD requirement that could cause SOCWA to shut down its co-generation operation that has taken one of its large treatment plants nearly off the electrical grid.

“Under the AQMD guidelines we wouldn’t be able to operate co-generation without enormous added costs to meet the emission requirements,” he said.

With energy costs as the second largest budget item behind labor, the authority is looking at developing an energy policy to bring in other technologies where possible, Rosales added.

“Solar is a good green alternative, but it is expensive to put in and cannot generate enough energy to off-set operations like our co-generation does,” Rosales said. “Our focus will be to off-set some of our energy needs to get us somewhat off the grid.”



**Regulatory Affairs** by Regulatory Affairs Consultant Mary Jane Foley

The Governor has signed or vetoed all of the legislative bills for this session. As the regulatory consultant, I keep updated on the bills affecting our membership. One that was not favored by the regulatory community was SB 1001, Perata. This bill would have changed the Regional Board membership by allowing anyone interested in water quality to be eligible; pretty low qualifications! On the last day for the Governor's action, he vetoed this bill. He sent a lengthy directive to the State Waterboard, requesting a comprehensive report of the baseline regulatory programs that require the establishment of performance metrics for all the programs. He also stated that the Waterboard should cut costs where possible and have more consistency where appropriate. This was a pretty lengthy veto message by the Governor. I just shared some of the highlights.

There are two new water recycling laws. One law allows recycled water for toilets and urinal flushing in condominiums. The other law directs the State Waterboard to adopt a general permit for the use of recycled water for landscape irrigation. I talked to one of the board members on how this law would influence the current draft water recycling policy. She hoped the work already done on the draft would be the baseline for the new statewide permit as a result of the law. Finally, last month I was dubious that the pharmaceutical drug waste disposal bill would be signed. The good news: it was passed and is law. It directs the Integrated Waste Management Board to work with the Dept. of Toxic Substances, the State Waterboard and the California State Board of Pharmacy to establish a model drug disposal program. This will help our campaign, "No Drugs down the Drain."

At a recent TriTAC forum, I offered to help in the POTW effort with the Department of Pesticides and various stakeholders in the mission of reducing harmful pesticides from entering the sewer system. The Department of Toxics has a similar program called the Green Chemistry Initiative. The goal of this program is to encourage the design of safer chemicals and products. This will be extremely beneficial for sewerage agencies.

I know that the Water Issues Committee column will discuss the status of the draft water recycling policy. I will just re-emphasize the three main issues related to irrigations and a short summary of recharge. The irrigation issues are 1) the 300 mg/l increment for TDS, 2) the reference to NPDES regulations and 3) Nutrient Management Plans. Because the SCAP membership has a variety of situations related to water reclamation, SCAP has requested individual letters from stakeholders. Several members have sent me copies of their individual letters. One that related to my local community, South Orange County, comments on the impact of the draft irrigation limits. Of the nine water districts producing 11,000 AF of recycled water, five would not be in compliance with the 300 mg/l. The Nutrient Management Plans would be impractical because there are 3,000 individual water use sites. On recharge of recycled water, the draft recommends allowing the regional water boards to set some human health standards if necessary. This is in conflict with the current process where human health is done by the Department of Public Health. The other main issue for recharge is the overly prescriptive liability for future unknown containments. Water recycling is on my front burner for my participation and assistance as an advisor to our SCAP membership. When I was on the

Water Board, I was crowned the “Queen of Water Recycling.” The plaque is above my desk. It is a natural for me to really get into this process.

This month I assisted the Air Quality Committee with a meeting with Orange County Supervisor Bill Campbell, who is a member on the SCAQMD Board. I know him well, and he will be helpful on our positions on the air issues impacting the membership.

Finally, I have arranged a meeting with SCAP and CASA to meet with Cindy Tuck, a Deputy with CalEPA. Cindy is the liaison for all the Departments and Boards in CalEPA. We are seeking her assistance in establishing a forum on cross-media issues with the appropriate agencies in the spring of 2008.

## **Help Desk**

Remember, the HELP DESK is open 24/7 for members who need to discuss permitting issues and strategies to assist agencies in resolving problems with regulatory agencies. Please contact Mary Jane Foley at [mfoley@scap1.org](mailto:mfoley@scap1.org).

## **Non Sequitur**

It isn't necessary to imagine the world ending in fire or ice. There are two other possibilities: one is paperwork, and the other is nostalgia.

**Frank Zappa**