



GAIL FARBER  
CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

April 23, 2009

Ms. Margo Brown, Chair  
California Integrated Waste Management Board  
P.O. Box 4025  
Sacramento, CA 95812-4025

Dear Chairperson Brown:

**COMMENTS REGARDING NEW AND EMERGING CONVERSION TECHNOLOGIES:  
REPORT TO THE LEGISLATURE (JUNE 2007)**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) I would like to request that several key recommendations be reinstated into the June 2007 version of *New and Emerging Conversion Technologies: Report to the Legislature (Report)*, which were originally incorporated in the version of the Report adopted by your board in February of 2005. The 2005 version of the Report, which was developed in accordance with State law, provides vital information regarding conversion technologies as effective solid waste management alternatives in California, and recommendations for how the Legislature might better address current policies to promote these new technologies. The Task Force is a longtime supporter of conversion technologies. Not only was the Task Force a key advocate for the passage of Assembly Bill (AB) 2770 (Matthews), but we have provided feedback on multiple policy issues as well as the 2005 version of the Report.

Conversion technologies refer to a wide array of biological, chemical, thermal (excluding incineration), and mechanical technologies capable of converting residual post-recycled solid waste and other organic feedstocks into useful products, alternative fuels, and clean, renewable energy. The 2005 Report found that conversion technologies produce more energy than landfilling or transformation, thus creating large lifecycle benefits such as reduced dependence on fossil fuels. The 2005 Report also found that conversion technologies can lower emissions of criteria air pollutants (NOX and SOX) and greenhouse gases compared to either landfilling or transformation (page 10). These advanced technologies are not only good for the environment but represent the potential for significant economic development in California, creating export-proof "green collar" jobs and providing a mechanism to fully utilize California's share of the Federal Economic Stimulus funds. The 2005 Report found that between 1,500 and

3,600 new jobs may be a resulting benefit of conversion technology development in the Los Angeles region (page 77).

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles (County) and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities, and to ensure a coordinated and cost-effective and environmentally-sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, the Los Angeles County Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

In 2005, the California Integrated Waste Management Board (CIWMB) completed a draft of the Report, as specified in AB 2770 (Matthews, 2002 Statutes), at a cost of \$1.5 million. AB 2770 was formulated and passed as a result of dedicated efforts by local governments and this Task Force. The Report incorporated detailed scientific research conducted at the Universities of California at Davis and Riverside, National Renewable Energy Laboratory, and RTI; and was peer reviewed for accuracy prior to finalization. Key findings of the report included the following:

- Based on life cycle analyses, the production of fuels and chemicals from the conversion of materials that would otherwise be landfilled can provide environmental benefits by displacing the extraction of non-renewable petroleum resources such as crude oil and natural gas.
- The development of conversion technologies in California is projected to result in a large net energy savings.
- The development of conversion technologies in California is projected to result in the lowest net levels of NO<sub>x</sub> emissions among the alternatives evaluated, and resulted in a significant net NO<sub>x</sub> emissions avoidance.
- The development of conversion technologies in California is projected to have a net positive impact on glass, metal, and plastic recycling.
- There are lower CO<sub>2</sub> emissions from conversion technologies than other alternatives, which would result in important climate change benefits.

However, when we reviewed the 2007 version of the Report, we were surprised to see that certain critical recommendations, which logically follow the findings above, had

been left out. We request that you forward to the Legislature these additional recommendations that were an integral part of the 2005 Report, including the following:

- **Recommendation for legislative changes to clarify statutory definitions**  
The 2005 Report recommends revising the definition of 'transformation' in the Public Resources Code 40201. The Task Force has consistently supported this revision as the current definition of transformation lumps multiple technologies (i.e. distillation, biological conversion, and pyrolysis) under the same umbrella as waste to energy, even though they are completely different processes.
- **Recommendation to delete from Statute the scientifically inaccurate definition of "gasification"**  
Public Resource Code Section 40117 improperly defines gasification as a process that uses no air or oxygen in the conversion process. As stated in the 2005 Report, gasification means the conversion of solid or liquid carbon-based materials by direct or indirect heating using limited amounts of air or oxygen.
- **Recommendation to conduct a research study on the impact of China on the demand for recycled materials**  
As noted in the 2005 Report, this issue transcends the conversion technology issue and relates to all recycling markets. In recent months we have seen the collapse of the global recycling markets causing California recyclers to stockpile materials, potentially creating a public health and safety hazard. This collapse impacts all jurisdictions in State that are required to fulfill AB 939 diversion mandates, potentially costing hundreds of thousands in noncompliance fees. On November 18, 2008, the Waste Board issued a press release regarding this issue and emphasized the need to develop local and regional markets to lessen our dependence on overseas markets.
- **Recommendation to work with the Air Resources Board to authorize and conduct third party emissions studies on conversion technology facilities around the world**  
This would provide a basis for conversion technology performance in California and act as a resource to lawmakers when developing conversion technology regulations.

We appreciate your consideration and the follow up to include the above listed recommendations of the 2005 version of the Report into the latest version of the Report. The Task Force looks forward to working with you in realizing our mutual goal of a more

Ms. Margo Reid Brown  
April 23, 2009  
Page 4

sustainable California. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,

*Margaret Clark*

Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor, City of Rosemead

TM/CS:ca  
P: sec\taskforce\Letters\ TF Letters CIWMB CT Report

cc: Governor Arnold Schwarzenegger  
Senate President Pro Temp Darrell Steinberg  
Assembly Speaker Karen Bass  
Senator Dennis Hollingsworth, Minority Leader  
Assembly Member Michael Villines, Minority Leader  
Each Member of the California Integrated Waste Management Board  
Mr. Mark Leary, Executive Director, California Integrated Waste Management Board  
Each Member of the County of Los Angeles Legislative Delegation  
Each Member of the County of Los Angeles Board of Supervisors  
Each City Mayor in the County of Los Angeles  
California State Association of Counties  
League of California Cities  
League of California Cities, Los Angeles County Division  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Solid Waste Association of North America  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Alternative Technology Advisory Subcommittee  
Each City Recycling Coordinator in Los Angeles County