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May 12, 2011

Ms. Nancy Sutley, Chair
White House Council on Environmental Quality
722 Jackson Place, NW
Washington DC, 20503-0002
Dear Ms. Sutley,

CONVERSION TECHNOLOGIES: AN OPPORTUNITY TO ENHANCE OUR ENVIRONMENT, IMPROVE OUR ENERGY INDEPENDENCE, AND STIMULATE OUR ECONOMY

The Los Angeles County Integrated Waste Management Task Force (Task Force) would like to applaud President Obama for his “Blueprint for a Secure Energy Future” in which a key element is developing and securing America’s energy supplies through the deployment of American assets, innovation, and technology. As the President sets forth to achieve this goal, we would like to take the opportunity to share with you our efforts to evaluate and promote new solid waste conversion technologies and our findings after extensive research.

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 by the County and the 88 cities in the County of Los Angeles with a combined population equivalent to approximately one-third of the California population. Consistent with these responsibilities and to ensure a coordinated and cost-effective solid waste management system in the County of Los Angeles, the Task Force also addresses issues impacting the solid waste management system on a countywide basis. The Task Force membership includes representatives of the League of California Cities (Los Angeles County Division), the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of governmental agencies.

For the past decade the Task Force, in coordination with local governments such as the County of Los Angeles (County), has supported the development of conversion technologies as an alternative to landfills for disposal of post-recycled municipal solid waste (MSW). Conversion technologies are non-combustion thermal, chemical, mechanical, and biological processes that are capable of converting post-recycled residual MSW into useful products and chemicals, green fuels like ethanol and biodiesel, and clean renewable energy.

Over 140 operating facilities are successfully processing solid waste in Europe and Japan; however, no commercial facility has been constructed in the United States yet. The Task Force along with other entities, including the City and County of Los Angeles, have extensively evaluated various conversion technologies from around the world and concluded that these technologies can fundamentally change the way we manage waste diverting up to 100 percent of the waste from landfill disposal, producing significant quantities of renewable energy and biofuels from waste, preventing emissions – including greenhouse gas emissions – that otherwise would have been produced , and most significantly, creating high-tech green collar jobs.

The Task Force would like to emphasize the following demonstrated benefits of conversion technologies:

1. **Conversion technologies can create green collar jobs and spur the economy** - Conversion technologies would create a range of new, high-tech jobs and contribute to the local economy by creating new advanced infrastructure.
2. **Conversion technologies can decrease net air emissions and greenhouse gases** - Conversion technologies have a simultaneous triple benefit to the environment: (1) reduction of transportation emissions resulting from long distance shipping of waste, (2) elimination of methane production from waste that would otherwise be landfilled, and (3) displacement of the use of fossil fuels by net energy (fuel and electricity) produced by conversion technologies.
3. **Conversion technologies can produce renewable energy and green fuels, thereby reducing our dependence on foreign oil** – Conversion technologies produce fuel and/or energy. By utilizing conversion technologies, California and other states can develop clean, locally produced renewable energy and green fuels including ethanol, biodiesel, and electricity, which can be used to promote energy independence. Benefits from this independence include insulating residents from energy markets fluctuations and avoiding environmental impacts associated with the extraction, refining, transportation, and combustion of fuels.
4. **Conversion technologies are an effective and environmentally preferable alternative to landfilling** - Based on reports developed by the California Department of Resources Recycling and Recovery (formerly the California Integrated Waste Management Board), the County of Los Angeles, and other independent agencies, conversion technologies are environmentally preferable to land disposal practices. The Enclosure “A” provides a brief summary of these studies/reports, while copies of the reports are available at www.SoCalConversion.org. Development of conversion technologies is needed now to provide decision makers with environmentally preferable and economically viable options for the management of post-recycled waste materials.

5. Conversion technologies can manage materials that are not practically recyclable and at the same time create an incentive to increase recycling -

Not all solid waste currently disposed can be recycled or composted. Contaminated organic materials, higher number plastics, and other materials, which cannot be recycled or processed in an economically feasible manner, are ideal feedstock for conversion technologies. At the same time, inorganic materials including glass, metals, and aggregate have no value for conversion technologies and therefore create an incentive to separate and recover those materials for recycling prior to the conversion process.

The growing consensus among scientists, regulators, environmental protection agencies, local government officials, residents, and businesses throughout California and the Country is that conversion technologies are a critically needed infrastructure to meet our long-term environmental and renewable energy goals while jump-starting the economy.

The Task Force considers conversion technologies a potentially vital component of President Obama's Blueprint for a Secure Energy Future. However, in order for these efforts to be successful, it is important that an appropriate national and statewide framework is established for regulating and permitting new facilities. We see three key areas that, if implemented on the Federal level, could grow this industry in the United States and benefit the many jurisdictions considering these technologies for MSW management:

- Acknowledge MSW as a renewable resource at the Federal level since many technologies exist to recover energy, fuels, and other beneficial products from this waste stream in an environmentally protective manner. This distinction would help spur the developments of these sophisticated technologies, already proven and successfully operating for many years throughout Europe and Japan, here in the United States.
- Clearly define and distinguish the differences between "waste-to-energy" and "non-combustion conversion technologies."
- Provide funding opportunities for "pioneer" conversion technology projects in order to pave the way for future project development. Government grants and low-interest loans add credibility to a project, increases the public's awareness of such projects, and leverages investment from the private sector.

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Thank you for your consideration of our comments. We appreciate the President's environmental and renewable energy goals and the work your office has done to advance these goals. We look forward to continue working constructively with you on this issue. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,



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

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cc: Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Task Force Alternative Technologies Advisory Committee