Attachments to the December 20, 2007, Minutes for the Los Angeles County Integrated Waste Management Task Force
Dear Vice Chair Clark:


This letter is a follow up to the November 13, 2007, comment letter sent by the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force to the California Integrated Waste Management Board (CIWMB) on the subject regulations.

This comment letter, in part, requested the re-insertion of the following phrase into Section 21815(d) of the proposed regulations: “Cost estimates shall include the cost for all activities yet to be completed even if the activity is tentatively planned to occur or be completed prior to closure or completion of postclosure maintenance.” The Sanitation Districts would like to point out that, while the Task Force has discussed other issues regarding the proposed regulations, we have not heard this specific point discussed and the Sanitation Districts, as an operator of disposal facilities, would like to clarify that we do not support this position. The reasons we do not support this position are outlined below.

- This language would significantly change what is included in the cost estimate for a landfill closure and, therefore, the amount of monies required to be set aside to meet this cost estimate. Landfill operators could potentially be required to include the costs of installing environmental control systems for the entire life of the landfill (up to 100 years worth in the case of the Mesquite Regional Landfill) or the entire landfill footprint, even if the landfill has just opened or only has refuse placed in a very small area. As a normal business practice, these systems are typically installed as areas of the landfill are developed and filled. This level of funding goes far beyond ensuring that a landfill operator has sufficient money for closure.

- Local government has limited financial resources. Monies that are placed into such a state fund would mean taking away monies otherwise available for local diversion programs and infrastructure.
• For a landfill operator utilizing trust funds, the operator would be funding for environmental control systems twice. The operator would need money in hand to install these systems while depositing monies into a trust fund. CIWMB would need to confirm that these environmental control systems have been installed before making any adjustments in funding level requirements or trust fund balances.

• The CIWMB, South Coast Air Quality Management District, and the Regional Water Quality Control Board already require the installation of environmental control systems as part of the landfill operations.

Many of the proposed CIWMB financial assurance regulations have far-reaching implications for public agencies and local government, so it is important that these regulations and issues be thoroughly discussed by the Task Force. We respectfully request that Task Force members be afforded the opportunity to discuss points raised in future letters on this issue. Thank you for consideration of this matter. If you have questions regarding this letter, please contact me at (562) 908-4288, extension 2761.

Very truly yours,

Stephen R. Maguin

Charles Boehmke
Planning Section Head
Facilities Planning Department

CB:ddg

cc: Task Force Members
November 13, 2007

Ms. Margo Reid Brown, Chair  
California Integrated Waste Management Board  
Cal-EPA Building  
1001 "I" Street  
Sacramento, CA 95812-4025

Dear Chairperson Brown:

PROPOSED REGULATIONS ON LANDFILL CLOSURE AND POSTCLOSURE COST ESTIMATES, DATED AUGUST 3, 2007

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, I would like to extend our support with suggested amendments for the proposed regulations and to also commend the California Integrated Waste Management Board (Waste Board) and its staff for their efforts in developing the proposed regulations.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 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 and its 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, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

We have reviewed the proposed regulations. The following comments are provided.
1. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21780: CIWMB–Submittal of Closure and Postclosure Maintenance Plans, Page 1.

   The Subsection (b) should be expanded to require the landfill operator to also provide two copies of each document to the local jurisdiction planning agency.

   We strongly believe that this will enhance communications among state, regional, and local regulatory agencies.

2. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21790: CIWMB–Preliminary Closure Plan Contents, Page 2.

   The Subsection (b)(8) should be expanded to add a new item (G) to read as follows: "(G) Site Re-Vegetation and Landscaping."

   We believe a Landfill, like any other business, should complement and enhance the community. Therefore, the plan should include the cost to re-vegetate and landscape the site so as to enhance and blend with the surrounding community. The site, upon closure or during postclosure maintenance period, should not degrade or become an eye-sore to the community.

3. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21815: CIWMB-General Criteria for Cost Estimates, Page 3.

   We support the proposed item (d) which states "Cost estimates shall include the cost for all activities yet to be completed even if the activity is tentatively planned to occur or be completed prior to closure or completion of postclosure maintenance"

   The proposal as a part of the Phase I closure and postclosure maintenance cost estimate regulations is appropriate since it affects the Plans Content and what environmental protection and control system activities must be included in determining the closure or postclosure maintenance cost estimates. This is an important step in not only ensuring that landfills operate under the most appropriate technical and environmental standards protecting public health, safety and the environment, but also in ensuring that the citizens of California are not left holding the bag at anytime during the closure or postclosure maintenance period, should the owner/operator default on its obligations or be in bankruptcy. We believe that the statement is consistent with the intent of AB 2296 which requires the Waste Board adopt this year a set of regulations that deal with improving the closure and post closure maintenance cost estimates.
4. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21820(b)(3), CIWMB–Closure Cost Estimates, Page 4.

We request that the Subsection (b)(3) be expanded to include a new item (F) to read as follows: "(F) Site Re-Vegetation and Landscaping."

We believe a landfill, like any other business, should complement and enhance the community. Therefore, the plan should include the cost to re-vegetate and landscape the site so as to enhance and blend with the surrounding community. The site, upon closure or during post-closure maintenance period, should not degrade or become an eye-sore to the community.

I appreciate your consideration and look forward working with you and your staff to ensure our disposal infrastructure continues to protect public health and safety and the environment. 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
Councilmember, City of Rosemead

cc: Each Member of the California Integrated Waste Management Board
    Executive Director, California Integrated Waste Management Board (Mark Leary)
    California Integrated Waste Management Board (Ted Rauh, Michael Wochnick)
    Each Member of the Los Angeles County Integrated Waste Management Task Force
Managing Municipal Solid Waste via an Electronic Reporting System

by

Linda Lee

For
Los Angeles County
Solid Waste Management Committee/
Integrated Waste Management Task Force
December 20, 2007

The Law

• Integrated Waste Management Act of 1989 mandated diversion goals.
The Task

• Starting 1995, Public Works began collecting and providing disposal data to over 300 jurisdictions.

• Public Works collects data from 14 Class III landfills, 3 inert landfills, 2 transformation facilities, 45 MRFs, and 120 WHs.
The Evolution

- PHASE I (1998): internal database application
- PHASE II (2003): web-based system for landfills and transformation facilities to submit data
- PHASE III (2006): system expanded to processing facilities and waste haulers
- PHASE IV (2008): upgrading software development tools and adding new features

The Design

- An intuitive web user interface
- Simple workflow from data collection to report dissemination
- A robust framework for data security and access privileges
- Easy system maintenance and expandability
The User

- Landfill
- Transformation Facility
- MRF
- Waste Hauler
- SWIMS Administrator
- Jurisdiction
- General public
- Waste Board

The Functionality

- Where to take your waste
- Links and contacts of facilities, haulers and jurisdictions, publications, news
• Interactive GIS application to verify jurisdiction by property address

• Data input by direct entry or template uploading for 15 origin survey forms
• Online viewing and downloading of 37 disposal reports

Waste Origin Verification Program Summary Report
By TRANSFER STATION / MATERIALS RECOVERY FACILITY
By Aggregated TRANSFER STATION / MATERIALS RECOVERY FACILITY

Reporting Period: From January 2007 to December 2007

The Functionality
The Functionality

- Customized summary, detail, and graphical reports

- Tracking tools to monitor data submission progress

American Waste Industries 01/2007
American Waste Transfer Station 01/2007 02/25/2007 08:59:53 AM Bed, Theressa Submitted to EPD
Angelus Western Paper Fibers, Inc. 01/2007
• Admin tools to manage users and functionalities

The Functionality

The Result

Disposal reports sent to jurisdictions and Waste Board via the Internet

2003

2004

2007

Full utilization by all 19 landfills and transformation facilities

40% inert debris engineered fill operations, 50% transfer/processing facilities, and 24% waste haulers
The Benefit

- Instantaneous and 24-Hour access to disposal data

- Significant increase in efficiency of data management

- Minimized human errors and manual data entry

- Saving the environment and storage space by eliminating paper reports

- $580,000 annual savings
• Quality assurance: rigorous and realistic testing

• Strong customer service and training

• Comprehensive scope of work, system requirements and definition study to compensate staff turnover

• Supportive internal IT staff
2007 Awards

• National Association of Counties
  Achievement Award Winner

• Center for Digital Government
  Best Application Serving
  Organization Business Objectives

• California State Association of Counties
  Challenge Award

• Los Angeles County 21st Annual Productivity and
  Quality Awards Program
  Traditional Plaque Award

• American Society of Civil Engineers Metropolitan Los
  Angeles Branch
  Technical Excellence Award

The Future

• An integrated and interactive GIS
  mapping application

• Upgrades ASP.NET, C#, Cognos,
  and Oracle 10G

• More interfaces to monitor diversion
  programs

• Optimizing data inputting process

• More convenient administration tools
Questions?

LLEE@dpw.lacounty.gov

www.solidwasteDRS.org
Americans throw away 25% more trash during the Thanksgiving to New Year’s holiday period than any other time of year. The extra waste amounts to 25 million tons of garbage, or about 1 million extra tons per week. You can help the environment by reusing. Here are some suggestions:

1. Recharge your batteries – when purchasing toys, electronics, or other items requiring batteries, remember to buy rechargeable batteries to go with them.

2. Spread the news – why not use newspaper to wrap your presents rather than purchasing new wrapping paper? Using the Sunday comics section would be an attractive and economical way to wrap young children’s gifts.

3. Gift Bags: The gift that keeps on giving – Gift bags are decorative and can be reused multiple times.

4. Don’t toss your wrapping paper – turn them into decorative packing material. Shred your gift wrap and use it for packaging delicate items or lining gift boxes.

5. Save your gift boxes, ribbon, and bows for the next holiday season – If every family reused just two feet of holiday ribbon, the 38,000 miles of ribbon could tie a bow around the entire planet. Wouldn’t that be a nice present to the World?

6. Turn Christmas cards into gift tags.

7. Out with the new calendar, in with the new! – Instead of tossing your old calendar, use the images to create artwork.

8. Pass on the paper towels, plates and cups – for all of your entertaining, use fabric napkins, dish towels, and hand towels. Disposable plates, cups, and utensils, are convenient, but with all of the other waste generated, why not use linens, dishes, and tableware that can be washed.

9. Don’t throw it! Post it! – rather than throwing away usable treadmills, typewriters, computers, televisions, or white goods, post them on the Los Angeles County Materials Exchange (LACoMAX) website, and turn your trash into someone else’s treasure.

10. BYOB: Bring your own Bag – Say No! To store-given shopping bags and carry your purchases in a reusable tote bag instead.

So, rather than waiting for New Year’s Day to make your “Reuse Resolution,” you can start today.