

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

DONALD L. WOLFE CHAIRMAN

March 17, 2005

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

Dear Chairwoman Marin:

CLASSIFICATION OF CONVERSION TECHNOLOGIES IN THE COUNTYWIDE SITING ELEMENT AMENDMENT PROCESS

The County of Los Angeles, in coordination with the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), is currently revising the Los Angeles County Countywide Siting Element (Siting Element). We are also in the process of analyzing the development of a conversion technology demonstration facility since we believe these technologies have the potential to divert residual solid waste from landfilling and incineration while converting these materials into useful products, fuels, and clean sources of energy.

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. Consistent with these responsibilities and to ensure a coordinated and cost-effective solid waste management system, the Task Force 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 other governmental agencies.

At a recent Task Force meeting, questions were raised regarding whether or not the location of potential/proposed conversion technology facilities must be identified in the Siting Element. At present, conversion technologies are categorized as solid waste

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disposal facilities. Under current regulations, all solid waste disposal facilities must be listed in the Siting Element in order to be issued with a Solid Waste Facility permit prior to its becoming operational. As you may know, we maintain that conversion technologies are not disposal facilities and should not be required to be identified in the Siting Element. If a conversion technology facility is considered a disposal facility, it would necessitate the project proponent or the County to pay for amending the Siting Element which in the County of Los Angeles is a two-year process that costs approximately \$250,000. This expensive and time-consuming process would stifle the development of conversion technology facilities within the County of Los Angeles. Since a number of conversion technology facilities are being considered or planned, we request the Waste Board to provide a written clarification to address this question.

We look forward to your timely response, since our Siting Element amendment process is currently under way. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Very truly yours,

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Michael Miller, Vice-chair Los Angeles County Solid Waste Management Committee/ Integrated Waste Management Task Force Councilmember, City of West Covina

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cc: Each Member of the California Integrated Waste Management Board 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 Southern California Association of Governments 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