



DONALD L. WOLFE
CHAIRMAN

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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October 18, 2004

Ms. Rosario Marin, Chair
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826-3268

Dear Chairwoman Marin:

REVISIONS TO DISPOSAL REPORTING SYSTEM REGULATIONS
SEPTEMBER 2004 VERSION

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) I would like to thank the California Integrated Waste Management Board (Waste Board) for the opportunity to provide comments on the proposed revisions to the Disposal Reporting System Regulations. The Task Force also appreciates the Waste Board's efforts in initiating a formal discussion process on the improvement to the AB 939 diversion compliance system on October 5, 2004.

Pursuant to Section 40950 of the California Public Resources Code and Chapter 3.67 of the County of Los Angeles Code, 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 prior to their submittal to the Waste Board. The Task Force is also very knowledgeable in various aspects of solid waste management and its membership includes appointees of the League of California Cities, the County Board of Supervisors, the City of Los Angeles, solid waste industries, environmental groups, governmental agencies, and the private sector.

The Task Force continues its full support in providing jurisdictions with additional tools to assist them in substantiating their mathematical compliance with the State waste diversion mandates. However, the proposal requiring landfill, transformation, and transfer station operators to submit information on disposal reporting methods to an Agency both quarterly and annually is duplicative and unnecessary. Additionally, the Task Force believes the proposed requirement to provide information on compaction rates and waste-to-cover ratios has more to do with estimating a landfill's remaining capacity than determining the amount of waste disposed by each jurisdiction and, as such, should not be part of these regulations.

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For many years the jurisdictions in the County of Los Angeles, the County Board of Supervisors, and the Task Force have expressed concern with the existing AB 939 diversion compliance system as well as identifying its deficiencies and potential alternatives. As has been stated in the past, the existing mathematical system of compliance will not work in a metropolitan area such as the County of Los Angeles; and as an alternative, the system should place emphasis on waste diversion programs implementation while the numbers generated by the Disposal Reporting System should be used by jurisdictions to measure the effectiveness of their individual programs. This is particularly enlightening based on comments expressed by other stakeholders at the October 5, 2004, workshop. However, as stated above, the proposed revisions will assist jurisdictions in gathering more accurate disposal tonnages even though the proposal will further expand the "bean counting" process.

We thank the Waste Board for its efforts in addressing the deficiencies of the AB 939 diversion compliance system and the Disposal Reporting System. We stand ready to work with your Board and your staff in achieving resolution to these issues as well as building on AB 939 to further reduce waste generation and expand diversion activities.

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

Sincerely,



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

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cc: Each Member of the California Integrated Waste Management Board
Mr. Mark Leary, Executive Director, California Integrated Waste
Management Board
California Integrated Waste Management Board (Patrick Schiavo, Diane Shimizu)
Each City Mayor in the County of Los Angeles
Each Member of the County of Los Angeles Board of Supervisors
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
Each Member of the Los Angeles County Integrated Waste Management Task Force