

**Attachments to the December 20, 2007, Minutes
for the Los Angeles County
Integrated Waste Management Task Force**



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

December 17, 2007

Ms. Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
P.O. Box 1460
Alhambra, CA 91802

Dear Vice Chair Clark:

**November 13, 2007 Comment Letter on Proposed
Regulations On Landfill Closure and Postclosure Maintenance (PCM) Cost Estimates**

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 (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



LOS ANGELES COUNTY
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DONALD L. WOLFE
CHAIRMAN

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.

Ms. Margo Reid Brown
November 13, 2007
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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

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

MA:cw

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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

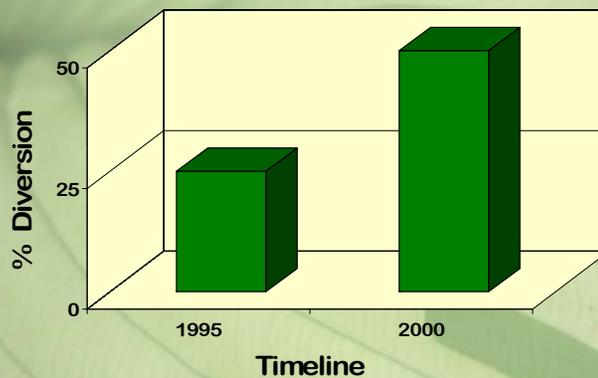
Managing Municipal Solid Waste via an Electronic Reporting System

by
Linda Lee

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



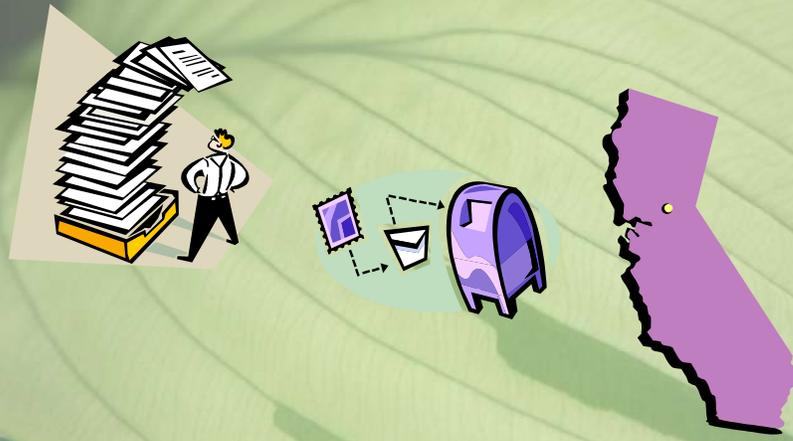
- Integrated Waste Management Act of 1989 mandated diversion goals.



The Law

The Task

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



The Task

- 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

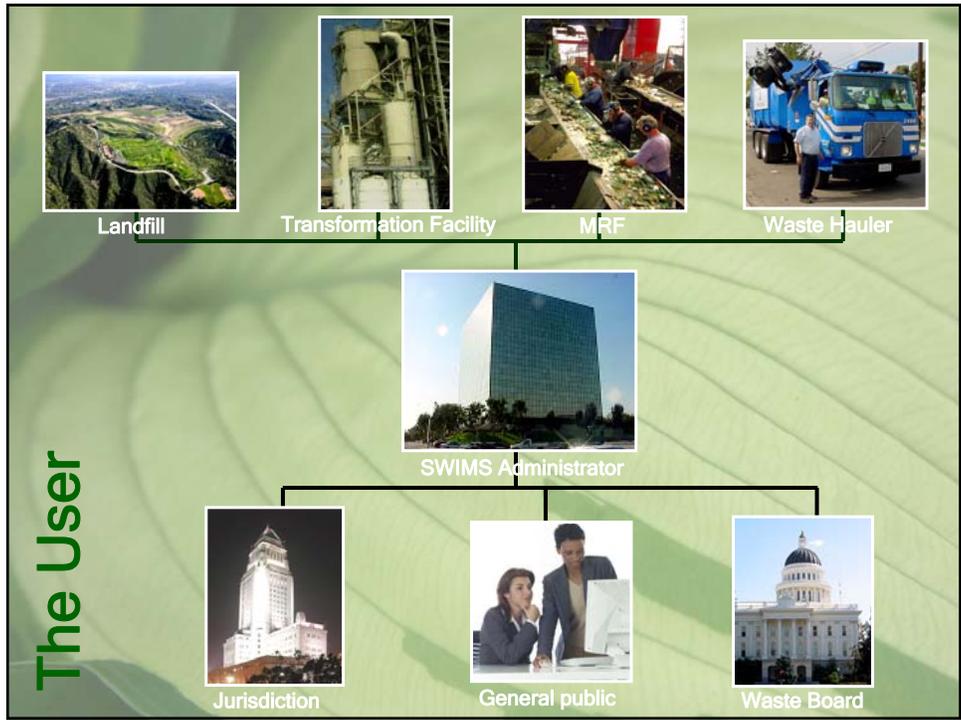
The Design

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



- Where to take your waste
- Links and contacts of facilities, haulers and jurisdictions, publications, news

The Functionality

- Interactive GIS application to verify jurisdiction by property address

The Functionality

1 [18602 ALDERBURY Drive](#)
 2 [18612 ALDERBURY Drive](#)
 3 [18624 ALDERBURY Drive](#)
 4 [18630 ALDERBURY Drive](#)

ID	Address	Building Unit	Status	Jurisdiction Entered	Verified Jurisdiction	Remarks	Zone
1	18602 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		
2	18612 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		
3	18624 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		
4	18630 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		
5	18660 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		
6	18668 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		
7	18674 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		
8	18682 ALDERBURY Drive		Verified	Counts Unincorporated	Counts Unincorporated		

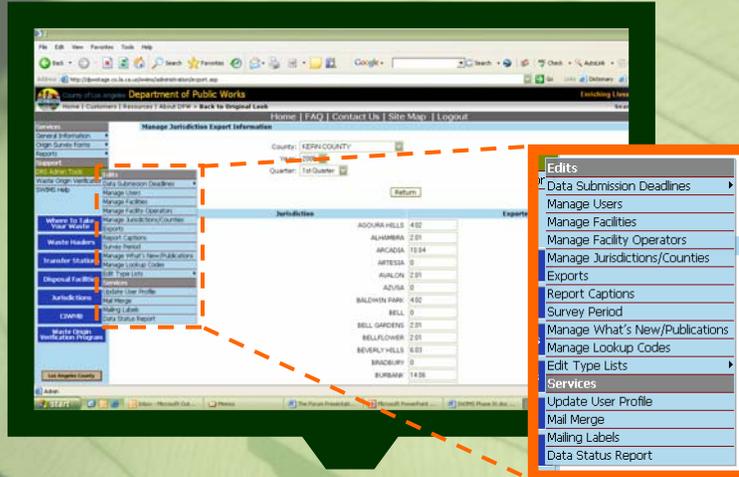
- Data input by direct entry or template uploading for 15 origin survey forms

The Functionality

Name of Jurisdiction	Quantity of Waste Received (Tons)	Recycled/ Reused	Composted
ANAHEIM	4.41	2.99	0.00
BELLFLOWER	1.22	0.83	0.00
BEVERLY HILLS	18.20	12.37	0.00
BREA	16.74	11.34	0.00

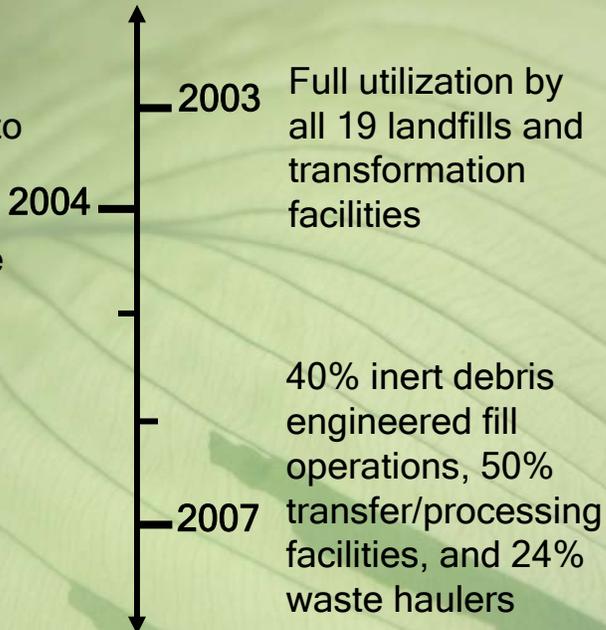
The Functionality

- Admin tools to manage users and functionalities



The Result

Disposal reports sent to jurisdictions and Waste Board via the Internet



The Benefit

- Instantaneous and 24-Hour access to disposal data



- Significant increase in efficiency of data management



- Minimized human errors and manual data entry



The Benefit

- Saving the environment and storage space by eliminating paper reports



- \$580,000 annual savings



The Lesson

- Quality assurance: rigorous and realistic testing
- Strong customer service and training



The Lesson

- Comprehensive scope of work, system requirements and definition study to compensate staff turnover
- Supportive internal IT staff



The Recognition

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



www.solidwasteDRS.org

Questions?



LLEE@dpw.lacounty.gov



RING IN THE NEW YEAR WITH REUSE



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.