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August 20, 2009

Mr. Clark Williams
Supervisor, Climate Change and Technology Section
California Integrated Waste Management Board
1001 I Street
P.O. Box 4025
Sacramento, CA 95814

Dear Mr. Williams:

Comments on Draft Final Project Report on Life Cycle Assessment and Economic Analysis of Organic Waste Management and Greenhouse Gas Reduction Options

I am writing you on behalf of the SWANA Legislative Task Force to comment on the subject draft final report that is intended to identify and quantify the costs, energy use, and greenhouse gas (GHG) emissions associated with implementing waste diversion alternatives in California

The report finds that a significant amount of new infrastructure is needed to implement organics diversion in California, particularly in composting and waste-to-energy. With both policy and legislation mandating a greater diversion of materials from landfills, it is important that all alternative management options for these materials be available. The full range of conversion technologies need to be included in the mix of options to manage organics and post-materials recovery facility residuals. In February 2008, the California Air Resources Board's Economic and Technology Advancement Advisory Committee (ETAAC) released a report noting that by conservative estimates, conversion technologies have the potential to reduce annual GHG emissions by approximately five million metric tons of CO₂ equivalent in California. Moreover, the potential GHG reduction of conversion technologies may be significantly greater, since conversion technologies have a simultaneous triple benefit to the environment: (1) reduction of transportation emissions resulting from long distance shipping of waste; (2) preventing methane and other emissions from waste that would otherwise be landfilled; and (3) displacement of the use of fossil fuels from the energy (fuel and electricity) produced by conversion technologies.

The report recognizes that a significant portion of recyclables generated in California are shipped to the Pacific Rim Countries. However, due to lack of adequate data on energy consumption and emission from manufacturing operation in these countries, the report utilizes data as if those facilities were operating in North America. There is no reasonable justification for such an assumption which renders the report's analysis and results very deficient. Accurate and verifiable data is essential for preparation of such a report.

Regarding assumptions for recycling scenarios, the report should not assume that all recycling is closed-loop, meaning that a product will be recycled into exactly the same product at the end of its useful life. Many materials are recycled in an open-loop process and the impacts of this difference should be considered.

Lastly, given that siting and permitting these facilities are extremely difficult, particularly in the greater Los Angeles area; landfills will continue to be an integral part of the organics waste management portfolio in California. While waste diversion remains a priority, as indicated in the report, landfills are a cost effective and environmentally beneficial option for managing organics, particularly when considering the long-term sequestration of carbon, the high collection efficiencies of landfill gas, and the displacement of fossil fuel from energy recovery using landfill gas. With the implementation of the California Air Resources Board's Methane Reduction Rule, landfill gas collection efficiencies will increase throughout the state, thereby providing an even smaller carbon footprint in California.

Mr. Clark Williams
California Integrated Waste Management Board
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On behalf of the SWANA LTF, I would like to thank you for your consideration of these comments and I would be happy to discuss them further, if you have any questions, at your convenience.

Sincerely,



Paul J. Voder
Legislative Advocate

cc: Mark Leary, Executive Director, CIWMB
Howard Levenson, Program Director, CIWMB
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