



SWANA[®]
SOLID WASTE ASSOCIATION
of North America

CALIFORNIA CHAPTERS

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May 31, 2005

Rosario Marin
Chair, California Integrated Waste Management Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

RE: Disposal Reporting System Regulations

Dear Chair Marin,

The Solid Waste Association of North America (SWANA) is composed of approximately 7000 public and private sector solid waste management professionals throughout North America dedicated to the development and enhancement of environmentally and economically sound practices and policies for the integrated management of municipal solid waste. There are approximately 900 members of SWANA in California, and on their behalf I am writing to submit comments on the proposed revision of existing disposal reporting system and adjustment method regulations based on Board recommendations in the report to the Legislature entitled "A Comprehensive Analysis of the Integrated Waste Management Act Diversion Rate Measurement System."

SWANA has aligned its comments and concerns in conjunction with those items listed in the April 2005 Disposal Reporting Systems Regulations Revisions Issue Paper from the Sustainability and Markets Development Workshop.

SWANA concerns are as follows:

ISSUE 2: *Alternative daily cover, alternative intermediate cover, beneficial use and disaster waste definitions*

- It is difficult to distinguish between potential alternative daily cover (ADC) and alternative intermediate cover (AIC) upon arrival of the material at the facility

ISSUES 3, 5, 11: *3) Volumetric conversion factor requirements; 5) Clean and contaminated soil definitions; 11) Landfill capacity related definitions and reporting requirements*

Staff is requesting too much landfill information too frequently

- Quarterly is excessively burdensome on operators and jurisdictions
- AIC, ADC, volumetric conversion factors, compaction rates, landfill capacity do not fluctuate enough to warrant quarterly reporting
- Local jurisdictions can request/require increased frequency or reporting
- This reporting should be left to permit approvals or a maximum of annual reporting

ISSUE 7: *Request to raise the weighing requirement threshold to 12 cubic yards from 6 cubic yards/1 ton loads*

Support raising the weighing threshold to 12 cubic yards

- This removes most self-haul and pick-up trucks from mandatory weighing
- Adding another provision to the mandatory scale requirement (18809.2) that would exempt facilities that only accept loads less than 12 cubic yards

ISSUE 10: *Consideration for a later effective date for regulations*

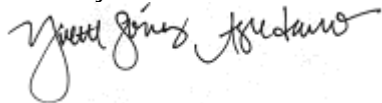
It is unclear how this package relates to proposed changes of the AB 939 Alternative Diversion Compliance Proposal

- Do we need these regulatory fixes prior to statutory changes that include the AB 939 Alternative Diversion Compliance proposal which is easily several years away?
- Delay Disposal Reporting portion of package

The California Chapters of SWANA appreciate the opportunity to comment on this proposed regulatory package. We also commend the Board for directing staff to formally notice the revised regulations for this 15-day comment period not only relating to the most recently proposed changes to the regulation but also to consider further comments on origin survey frequency.

Your consideration of our position and comments is greatly appreciated.

Sincerely,



Yvette Gómez Agredano
Legislative Advocate
SWANA, California Chapters

CC: Other Members, CIWMB
Diane Shimizu, CIWMB Staff, Diversion, Planning and Local Assistance Division
Will Dickinson, Chair, SWANA California Chapters
Mark Urquhart, Secretary, SWANA California Chapters