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2007-2008 Legislation

This section provides the status of each bill acted on by the LTF since the beginning of the 2007-2008 legislative session and a copy of the most recent correspondence.

Regulatory Information

This section provides information on the actions of regulatory agencies.

Resources

[Online Guide to the Legislative Process](#)

Legislative Task Force Business

LTF Meeting Agendas and Minutes are available on the LTF website (www.swanacal-leg.org). Click [here](#) to view.

2007-2008 Legislation

The Legislature has now concluded their legislative business for 2007-2008, however they continue to meet and discuss State Budget Proposals. The last two weeks of session were busy with proponents of issues detrimental to SWANA members amending bills and pushing for last minute action. Below are the bills that the LTF has taken positions on throughout the session. Position letters that SWANA has written to the legislature are located directly below the bill information as well as on the Legislative Task Force website at www.swanacal-leg.org (*Click on the bill number to go to the bill's legislative page, sponsored by Legislative Counsel*):

Priority Legislation (in order of significance)

We would like to highlight the six most significant pieces of legislation for the 2007-2008 legislative session.

SB 1016 (Wiggins) Diversion: Annual Report

SB 1016 has two primary components: 1) change the diversion rate reporting requirements to a jurisdictional equivalent disposal measurement requirement, as an indicator of program implementation; and, 2) Reduce the frequency of reporting and reviewing of the annual report, based on compliance. SB 1016 does not change the AB 939 50% requirement but is attempting to build on AB 939 compliance requirements by implementing a simplified and timelier indicator of jurisdictions' performance by changing to a disposal based number as reported by disposal facilities. The author's office and all interested stakeholders met and worked tirelessly on the proposal since its introduction last year. SWANA was able to offer its SUPPORT after a final amendment was taken to include intent language to confirm that the purpose of this legislation is to move away from a "bean counting" form a determining compliance and consider all aspects of a jurisdictions effort to achieve compliance to include programs and economic factors. In an effort to assist jurisdictions in their planning, the CIWMB has developed and distributed a Per Capita Equivalent form (attached) for all jurisdictions, and a draft calculator (attached) to assist with the SB 1016 calculations.

LTF Position: Support

Status: Enrolled to Governor

Letter to the Governor

August 29, 2008

The Honorable Arnold Schwarzenegger
Governor, State of California
State Capitol
Sacramento, CA 95814

Dear Governor Schwarzenegger:

RE: SB 1016 (Wiggins) – REQUEST FOR SIGNATURE

On behalf of the Solid Waste Association of North America, we would like to request your **SIGNATURE** of **SB 1016 (Wiggins)**.

SB 1016 would change the State's diversion rate reporting requirements to a jurisdictional equivalent disposal measurement requirement. SB 1016 proposes a new compliance measurement system that would place more emphasis on the implementation of waste reduction, recycling, and other waste diversion programs, and less emphasis on the current mathematical accounting system.

We would like to thank the author for including new amendments that: 1) clarify the evaluation methods of a local jurisdictions' good faith efforts and 2) allow jurisdictions in the process of a new generation study covering 2007 to be allowed to have these studies considered in creating the new proposed base year.

SWANA especially appreciates the work of the author, sponsors and staff of SB 1016 (Wiggins) to craft a bill that local governments in California can support and your willingness to include these last amendments

for our organization to offer its Support and respectfully request your **SIGNATURE** of **SB 1016 (Wiggins)**.

SB 1020 (Padilla) Solid Waste: diversion

The current language of the bill would require the board, by July 1, 2009, to develop a strategic and comprehensive plan to achieve, on or before January 1, 2020, a diversion of 75% of solid waste statewide from landfill disposal or transformation. There have been extensive discussions with the author's office and other stakeholders as to how this will be affected by the changes proposed in SB 1016. The author's office has also indicated that there will be a mandatory commercial recycling ordinance.

(Significant amendments were being developed however the bill was never amended)

LTF Position: Oppose

Status: DEAD- Failed to pass Legislative deadline

Joint Strong Concerns letter sent to Senator Padilla and Assembly member Wiggins

July 15, 2008

The Honorable Alex Padilla
Member, of the California State Senate
State Capitol, Room 4032
Sacramento, CA 95814

The Honorable Patricia Wiggins Member,
of the California State Senate State
Capitol, Room 4081 Sacramento, CA
95814

RE: Senate Bill 1016 and Senate Bill 1020 - STRONG CONCERNS

Dear Senator Padilla and Senator Wiggins:

On behalf of the Solid Waste Association of North America (SWANA), the Regional Council of Rural Counties (RCRC), the California State Association of Counties (CSAC), the Sanitation Districts of Los Angeles County (LACSD), and the League of California Cities (the League), we are writing to express our strong concerns over recent amendments to Senate Bill 1016 (Wiggins) and proposed amendments to Senate Bill 1020 (Padilla).

SB 1016, which is sponsored by the Integrated Waste Management Board (the Waste Board), would re-calculate the way solid waste diversion efforts are imposed upon local governments. The bill also revises the timelines that local jurisdictions must adhere to when reporting to the Waste Board. SB 1020, as proposed to be amended, sets a new 60% mandated level for jurisdictions to meet in diverting their solid waste from landfills. SB 1020 also requires specified cities and counties to adopt local ordinances which impose recycling mandates on local businesses.

Several of our organizations adopted a qualified support for SB 1016 in the belief that a new calculation method and a new timeline scheme would be beneficial to the Waste Board and local jurisdictions. That qualified support position was reached with some apprehension and was predicated upon the Waste Board having flexibility and discretion in approving local diversion plans. A recent amendment (page 6, lines 1 - 12) removes the discretion of the Waste Board to

use per-capita disposal numbers as one indicator of a jurisdictions' effort in compliance. In other words, we believe the latest version of SB 1016 requires the Waste Board to include per-capita disposal calculations when determining compliance. We respectfully request that this provision be returned to its original form or unfortunately, the support that was offered earlier will be reversed.

Complicating the latest amendment to SB 1016 are proposed amendments to SB 1020. In essence, without some flexibility given to the Waste Board with respect to compliance determination, virtually every jurisdiction in California will have a difficult - and some say impossible - time attaining a 60% diversion requirement as called for in SB 1020.

We would also request that once SB 1016 is amended, SB 1020 be amended to adopt a statewide goal of 60% by 2015. Specifically, we request that, when SB 1020 is amended, Section 41780(a) (3) of the Public Resources Code not be included. If these amendments can be made, local government can remove their opposition to each measure and we can continue to work towards these efforts being implemented in an appropriate manner.

If you have any questions or concerns about our position, please do not hesitate to contact any one of us at your convenience.

SB 1252 (Padilla) Vehicles: dealers: consumer protection

SB 1252 was the vehicle of choice to include language from Senator Padilla's failed SB 1020. The bill was never amended; however amendments were placed on the Assembly desk and this bill was watched very closely in the last few days of session.

LTF Position: Oppose

Status: DEAD- Never amended to include language from SB 1020

Joint Opposition letter sent to Senator Padilla

Joint Opposition letter sent to Senator Padilla

August 30, 2008

The Honorable Alex Padilla Member,
State Senate State Capitol, Room
4032 Sacramento, CA 95814

RE: Senate Bill 1252 (Padilla) (As proposed to be amended) - OPPOSE

Dear Senator Padilla:

On behalf of the Regional Council of Rural Counties (RCRC), the California State Association of Counties (CSAC), the Solid Waste Association of North America (SWANA), and the League of California Cities (the League), we are writing to express our strong opposition to your recently-amended Senate Bill 1252, which makes a number of significant changes in the manner in which municipal government manages solid waste.

As amended, SB 1252 is a collection of several measures that have been defeated during the current Legislative Session. Specifically, the measure: 1) increases the state-imposed solid waste disposal fee (AB 2866); 2) addresses illegal dumping (AB 2695); 3) assesses a fee for "excess" green material used for alternative daily cover (AB 2640); and 4) dramatically increases the solid waste diversion mandate that local governments must meet (SB 1020). With all due respect, we view your

recently-amended bill as an end-run around the Legislature's two-house committee process which has extensively reviewed each one of these measures and has rejected them due to either costs or valid public policy concerns.

Local governments are specifically concerned about the two resurrected aspects which now find themselves in SB 1252 - increasing the tipping fee and directing those proceeds to questionable and premature uses and raising the diversion mandate from the current 50% to 60% by 2015. We have repeatedly said that when you join these two specific items together, they greatly diminish our ability to effectively reach the current 50% diversion requirement, let alone a much tougher 60% requirement in several years. Quite frankly, we have been working with your staff to address an increase in the diversion rate and we were beginning to feel comfortable with the perimeters of that increase. However, increasing the diversion rate in manner being put forth in SB 1252 leaves our organizations with no other option but to oppose each and every component of the bill.

AB 1390 (Huffman) Solid waste: diversion: illegal dumping: fees:

AB 1390 was a last minute play by Senate Padilla and Assemblyman Huffman to incorporate the language from AB 2640, AB 2695, AB 2866 and SB 1020 into one "Super Solid Waste Bill." However due to extensive lobbying the bill was held in Senate Rules.

LTF Position: Oppose

Status: DEAD- Held in Senate Rules

Joint Opposition letter sent to Assemblyman Huffman

August 25, 2008

The Honorable Jarred Huffman Member,
State Assembly State Capitol, Room
4139 Sacramento, CA 95814

RE: Assembly Bill 1390 (Huffman) - OPPOSE (As amended 8/22/08)

Dear Assemblyman Huffman:

On behalf of the Regional Council of Rural Counties (RCRC), the California State Association of Counties (CSAC), the Solid Waste Association of North America (SWANA), and the League of California Cities (the League), we are writing to express our strong opposition to your recently-amended Assembly Bill 1390, which makes a number of significant changes in the manner in which municipal government manages solid waste.

As amended, AB 1390 is a collection of several measures that have been defeated during the current Legislative Session. Specifically, the measure: 1) increases the state-imposed solid waste disposal fee (AB 2866); 2) addresses illegal dumping (AB 2695); 3) assesses a fee for "excess" green material used for alternative daily cover (AB 2640); and 4) dramatically increases the solid waste diversion mandate that local governments must meet (SB 1020). With all due respect, we view your recently-amended bill as an end-run around the Legislature's two-house committee process which has extensively reviewed each one of these measures and has rejected them due to either costs or valid public policy concerns.

Local governments are specifically concerned about the two resurrected aspects which now find themselves in AB 1390 - increasing the tipping fee and directing those proceeds to questionable and premature uses and raising the diversion mandate from the current 50% to 60% by 2015. We have repeatedly said that when you join these two specific items together, they greatly diminish our ability

to effectively reach the current 50% diversion requirement, let alone a much tougher 60% requirement in several years. Quite frankly, local government has been working with Senator Alex Padilla in addressing an increase in the diversion rate and we were beginning to feel comfortable with the perimeters of that increase. However, increasing the diversion rate in manner being put forth in AB 1390 leaves our organizations with no other option but to oppose each and every component of the bill.

AB 2640 (Huffman) Solid Waste: compostable organics management

This bill would impose a \$1.40 per ton quarterly fee on green waste used for beneficial reuse, including use as alternative daily cover, at solid waste disposal facilities. Placing a tax on the reuse of one type of waste material is unprecedented. This bill is in addition to the California Integrated Waste Management Board's strategic directive in setting a goal of 50% reduction in "compostable organics" by 2020. The LTF will remain opposed to this legislation as long as there are any fees included in the language.

LTF Position: Oppose

Status: DEAD- Failed to pass fiscal committee

July 21, 2008

The Honorable Tom Torlakson
Chair, Senate Appropriations Committee
State Capitol Building, Room 2206
Sacramento, CA 95814

Re: AB 2640 (Huffman)-Solid Waste: Compostable Organics Management - OPPOSE



Dear Chairman Torlakson,

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 regretfully OPPOSE AB 2640.

AB 2640 will impose a \$1.40 per ton quarterly fee on green waste used for beneficial reuse, including use as alternative daily cover, at solid waste disposal facilities. This tax on the reuse of one type of waste material would be unprecedented and inappropriate. Green waste is not the only material that is reused as daily cover or used for other engineered applications and we question why green waste would be subject to the disposal fee when other materials used for the same purpose are not.

For these reasons, we regretfully must OPPOSE this measure.

AB 2866 (DeLeon) Solid Waste: closure liability: solid waste disposal fees

AB 2866 would require the board to establish the amount of the "tipping" fee in an amount not exceeding \$2 per ton and would require \$0.60 of that fee to be deposited by the State Board of Equalization in the Solid Waste Mitigation Account, which this bill would create in the fund.

LTF Position: Oppose

Status: DEAD- Failed to pass fiscal committee

July 21, 2008

The Honorable Tom Torlakson
Chair, Senate Appropriations Committee
State Capitol Building, Room 2206
Sacramento, CA 95814

Re: AB 2866 (DeLeon) - Solid Waste: Solid Waste Disposal Fees- OPPOSE

Dear Chairman Torlakson,

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 regretfully OPPOSE AB 2866, regarding solid waste disposal fees.

The current "tipping fee" is \$1.40 per ton and is solely used to fund a variety of activities by the Waste Board to assist in reducing or managing the disposal of waster throughout the State. AB 2866 would require the board to establish the amount of the fee in an amount not exceeding \$2 per ton and would require \$0.60 of that fee to be deposited by the State Board of Equalization in the Solid Waste Mitigation Account, which this bill would create in the fund. These fees would be distributed into 4 different sub accounts, none of which are specifically related to landfills.

SWANA does not support landfill tip fee increases to pay for programs that typically fund other industries or actions not specifically related to landfills.

For these reasons, we regretfully must OPPOSE this measure.

Additional Legislation of Interest

AB 48 (Saldana) Hazardous Waste: electronic waste

This bill expands the scope of electronic products that would be banned from sale in California if they are banned from sale in the European Union (EU) pursuant to the Reduction of Hazardous Substances (RoHS) directive.

LTF Position: Support

Status: Vetoed by Governor

AB 501 (Swanson) Pharmaceutical devices

This bill would require a pharmaceutical manufacturer whose product is administered for home use through a prefilled syringe, prefilled pen, or other prefilled injection device to arrange to provide, upon request from a consumer, a postage prepaid, mail-back sharps container that has been approved by the United States Postal Service.

LTF Position: Support

Status: Enrolled to the Governor

AB 546 (Brownley) Electronic Waste

Requires the California Integrated Waste Management Board (CIWMB) to compile a list, by county, of authorized electronic waste collection centers, which retailers must provide to consumers.

LTF Position: Support if Amended

Status: Vetoed by Governor

AB 642 (Wolk) Design Build: counties, cities and special districts

This bill would authorize a qualified entity, as defined, that operates a wastewater facility, solid waste management facility, or water recycling facility, with the approval of the appropriate governing body to enter into design-build contracts.

LTF Position: Support with Amendments

Status: Enrolled to the Governor

AB 822 (Levine) Solid Waste: multifamily dwellings

AB 822 would require on or after July 1, 2009, an owner of a multifamily dwelling to arrange for recycling services that are consistent with state or local laws or requirements, including local ordinances or agreements. "Multifamily dwellings" are defined as residential facilities that consist of five or more living units

LTF Position: Support

Status: DEAD- Did not pass legislative deadline

AB 904 (Feuer) Recycling: food containers

This bill would enact the Plastic and Marine Debris Reduction, Recycling, and Composting Act. This measure would on and after July 1, 2012, prohibit providers of takeout food from distributing single-use food service packaging to consumers unless the packaging is either compostable or recyclable.

LTF Position: Support

Status: DEAD- Did not pass out of fiscal committee

AB 1023 (DeSaulnier) Recycling: compostable and biodegradable plastic trash bags

AB 1023 would exempt manufacturers of compostable and biodegradable trash bags from California's recycled-content requirements for plastic trash bags. In part to address the issue of contamination, some trash bag manufacturers have begun to market compostable or biodegradable trash bags for use as yard waste bags. Because of the degradable nature of these bags, they are incompatible with conventional recycled plastic.

LTF Position: Support

Status: Chaptered by Secretary of State- Chapter 143, Statutes of 2007

AB 1109 (Huffman) Energy Resources- lighting efficiency: hazardous waste

This bill would enact the California Lighting Efficiency and Toxics Reduction Act and would prohibit, on and after January 1, 2010, a person from manufacturing for sale in

the state specified general purpose lights that contain levels of hazardous substances prohibited by the European Union pursuant to the RoHS Directive.

LTF Position: Support

Status: Chaptered by Secretary of State- Chapter 534, Statutes of 2007

AB 1195 (Torrico) Recycling: used oil: incentive payments

This bill requires used oil to be tested and analyzed by a lab accredited by the State Department of Public Health prior to being shipped or, if shipped to a California permitted transfer facility or used oil recycling facility.

LTF Position: Support

Status: DEAD- Did not pass out of fiscal committee

AB 1391 (Brownley) Electronic Waste

This bill would a retailer who sells covered electronic devices to provide a consumer at the point of sale the Integrated Waste Management Board's website. The website would provide information on where and how to return, recycle and dispose of a covered electronic devices.

LTF Position: Support

Status: Enrolled to the Governor

AB 1447 (Calderon) Hazardous Waste: major appliances

This bill would revise existing requirements to allow appliance service technicians to remove refrigerant from a major appliances.

LTF Position: Support

Status: Chaptered by Secretary of State- Chapter 709, Statutes of 2007

AB 1473 (Feuer) Solid Waste: temporary permits

This bill requires the CIWMB to adopt emergency regulations to authorize enforcement agencies to issue a temporary solid waste facilities permit.

LTF Position: Support

Status: Chaptered by Secretary of State- Chapter 547, Statutes of 2007

AB 1535 (Huffman) Electronic Waste: fee payment

This bill would require the manufacturer of a covered electronic device to pay the electronic waste recycling fee.

LTF Position: Support

Status: Died- Did not pass out of policy committee

AB 1751 (Fuentes) Vehicles: nuisance abatement: impoundment

This bill would authorize a city or county to adopt an ordinance declaring a motor vehicle to be a nuisance subject to impoundment for not more than 30 days when the motor vehicle is involved in the commission of specified crimes related to illegal dumping of commercial quantities of waste matter and prostitution.

LTF Position: Support with Amendments

Status: Enrolled to the Governor

AB 1860 (Huffman) Unsafe products: recall or warning

This bill would require a manufacturer of a recalled product to establish and maintain a collection system in the event a recall is issued for that product.

LTF Position: Support

Status: Enrolled to the Governor

AB 1972 (DeSaulnier) Solid Waste: plastic bags: food and beverage containers

This bill would prohibit the sale of a plastic bag that is labeled as "compostable" or "marine degradable," unless that bag meets the ASTM Standard Specification for Compostable Plastics D6400, the ASTM Standard Specification for Non-Floating Biodegradable Plastics in the Marine Environment D7081, or a standard adopted by the California Integrated Waste Management Board, as specified. The bill also would prohibit the sale of a plastic bag that is labeled as "biodegradable," "degradable," "decomposable," or as otherwise specified.

LTF Position: Oppose

Status: Enrolled to the Governor

AB 2347 (Ruskin) Mercury-added Thermostats: collection program

This bill would enact the Mercury Thermostat Collection Act of 2008 and would require a manufacturer that owns or owned a name brand of mercury-added thermostats sold in this state before January 1, 2006, to establish and maintain a collection, transportation, recycling, and disposal program for out-of-service mercury-added thermostats.

LTF Position: Support and Seek Amendments

Status: Enrolled to the Governor

AB 2829 (Davis) Recycling: plastic carryout bags

This bill will require on and after July 1, 2009 plastic bags provided by a store to have printed or display on the bag an environmental awareness message describing the negative impacts on the environment and wildlife caused by littering and encouraging the use of reusable bags.

LTF Position: Support

Status: Died- Failed passage from Assembly Natural Resources

SB 1021 (Padilla) Beverage Containers: grants

SB 1021 would authorize up to \$15 million in grants from January 1, 2008, to January 1, 2009, to place source separated beverage container recycling receptacles in multifamily housing.

LTF Position: Support

Status: Chaptered by Secretary of State- Chapter 724, Statutes of 2007

SB 1165 (Kuehl) Environmental Impact Reports

SB 1165 bill provides that any EIR over five years old must be re-circulated before it may be used again. This is an arbitrary expiration date and will largely stop the use of program EIRs and subsequent/supplemental EIRs, thereby eliminating a major streamlining tool from CEQA.

LTF Position: Oppose

Status: Failed passage from Senate

SB 1321 (Correa) School Recycling programs

SB 1321 would require each school district to acquire and maintain a sufficient number of beverage container recycling bins on each campus and public office in that school district.

LTF Position: Support if amended

Status: DEAD- Did not pass fiscal committee

SB 1357 (Padilla) Beverage Containers: grants

This bill will authorize the Department of Conservation to expend up to \$20,000,000 from January 1, 2009, to January 1, 2010, for either grants for beverage container recycling and litter reduction programs or focused, regional community beverage container recycling and litter reduction programs.

LTF Position: Support

Status: Enrolled to the Governor

SB 1723 (Maldonado) Agriculture: pesticide recycling program and certification

This bill would require every person who is the first to sell any agriculture, structural, industrial or institutional-use pesticide for use in this state that is packaged in high density polyethylene containers to establish a recycling program that would be subject to audit.

LTF Position: Support

Status: Enrolled to the Governor

Regulatory Information

CIWMB Landfill Gas Regulations

California Integrated Waste Management Board approved new landfill gas monitoring and control regulations last year. The new standards may require significant changes to the existing landfill gas system at facilities.

There is a number of interrelated activities underway including:

- Landfill Gas Monitoring and Control Plan Approval
- Landfill Gas Probe Design Best Management Practices
- Landfill Gas Training

Landfill Gas Monitoring and Control Plan Approval

A component of that regulation was to require approval by the LEA and the CIWMB of the Landfill Gas Monitoring and Control Program Plans. Originally the CIWMB was required to formally concur with the plans by September 20, 2008.

On Tuesday, August 19th, the CIWMB approved submittal of new regulations to extend the implementation date. Technically, these new compliance dates will not be in effect

until the regulations are final sometime early next year. The Board is encouraging the LEAs to follow the new dates. The proposed schedule is as follows:

<i>Operational Status</i>	<i>Submittal to LEA</i>	<i>Full Plan Implementation</i>
<i>Existing disposal sites (permitted for >20 tpd)</i>	<i>By September 21, 2008</i>	<i>September 21, 2009</i>
<i>Existing disposal sites (permitted for ≤20 tpd)</i>	<i>By September 21, 2009</i>	<i>September 21, 2010</i>
<i>Lateral expansions of existing disposal sites</i>	<i>Prior to receipt of waste in expanded area</i>	
<i>Disposal sites that have received final shipment of waste</i>	<i>Immediately</i>	
<i>Disposal sites actively implementing final closure activities</i>	<i>In accordance with approved final closure plan time schedule</i>	
<i>New disposal sites Disposal sites properly closed by November 18, 1990</i>	<i>Prior to receipt of waste None, unless required by Section 20919.</i>	

If the gas control and monitoring plan are submitted to the LEA by the required date, the LEAs are instructed to note an “area of concern” on their monthly inspection reports. A “violation” will be noted until the program plan is submitted. Extensions to the implementation date may be granted if the operator demonstrates a good faith effort on implementation and the delay is for reasons beyond their control. The Board must approve any extension request.

Once the plan is submitted to the LEA, the approval process is similar to permit revisions. The LEA has 60 days to approve, deny, or request additional information. Within 5 days of approval, the LEA submits the plan to the CIWMB for concurrence. The Board has stressed that concurrent reviews are possible to avoid delays in approval. I would recommend this since there is much confusion regarding these regulations and what is necessary for Board concurrence.

Landfill Gas Probe Design Best Management Practices

In July, the CIWMB reviewed a study of landfill gas monitoring well functionality. The study indicated that of 190 wells sampled at 20 landfills, 32% were considered non-functional. Based upon this study and recent events with the above regulations, the CIWMB is considering some Best Management Practices (BMPs). A copy of these BMP can be found at:

<http://www.ciwmb.ca.gov/LEACentral/LandfillGas/Monitoring/BMPWellConst.htm>

Comments on these BMPs are due by September 2, 2008. It is expected that these BMPs will be included in the gas monitoring plans.

Landfill Gas Training

Given the complexities of these issues, the CIWMB is offering training on "Understanding Landfill Gas Standards for Active Sites". Registration and class information is found at: <http://www.ciwmb.ca.gov/LEATraining/LandfillGas/2008AugOct/default.htm>

Dates and Locations:

September 30, 2008	Alameda, CA
October 2, 2008	Redding, CA
October 21, 2008	Long Beach, CA
October 23, 2008	Bakersfield, CA

Recommendations

In order to minimize complications with approval of plans, here are some recommendations:

- Determine compliance with the new standards and what is needed to come into compliance.
- Contact your LEA immediately to discuss the plan submittal and work with the LEA and your CIWMB contact to verify the plan submittal contents are adequate.
- If you are seeking any alternative compliance measures, make sure the alternative has been discussed with the LEA and CIWMB staff and you are prepared to submit the required documentation supporting the alternative.
- Request the LEA to agree to concurrent submittal of the plan to CIWMB staff.
- Provide comments on the gas probe BMPs by August 28th

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of North America