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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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June 13, 2014

The Honorable Jerry Hill, Chair
Senate Environmental Quality Committee
State Capitol, Room 2205
Sacramento, CA 95814

Dear Senator Hill,

**ASSEMBLY BILL 2371 (AMENDED APRIL 21, 2014) – OPPOSE
SOLID WASTE: HOUSEHOLD HAZARDOUS WASTE**

The Los Angeles County Integrated Waste Management Task Force (Task Force) **opposes** Assembly Bill 2371 (AB 2371) which would, among other things, require local jurisdictions to review and update their Household Hazardous Waste (HHW) program in order to increase “convenience” to residents.

As proposed by AB 2371, the jurisdiction “review” process, at least must include the following:

1. Analyze the extent to which its household hazardous waste program is convenient to the public.
2. Identify barriers to the convenient recycling and disposal of household hazardous waste.
3. Identify feasible methods to overcome those barriers and make it “**more convenient,**” as described below, for the public to recycle and dispose of household hazardous waste in a safe and legal manner (emphasis added).

*The proposed legislation defines the term “**more convenient**” to mean a measure to improve the opportunity for residential customers to properly recycle or dispose of household hazardous waste, including, but not limited to, increased availability or ease of access to household hazardous waste collection centers or collection events, **the availability of door-to-door or curbside collection services, and other measures that will demonstrably increase the amount of household hazardous waste properly managed, as determined by jurisdictions or the Department of Resources Recycling and Recover (Cal Recycle), (emphasis added).***

Not later than January 1, 2016, the proposed legislation requires each city and each county submit the results of its “review” process, as defined above, to CalRecycle for approval and further action as may be stipulated by CalRecycle.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 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 the 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, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

The California Integrated Waste Management Act of 1989 (AB 939), as amended, requires cities and counties to prepare, adopt, and implement an HHW Element which details a program dedicated to the collection, recycling, treatment and disposal of residential HHW. Los Angeles County’s Program which is operated on a Countywide basis hosts over sixty annual HHW mobile collection events throughout the County and runs nine permanent collection centers. The program includes a vigorous outreach component and provides elderly and disabled residents an opportunity to have their HHW picked up from their residence. In 2009, the Program piloted a used-oil curbside program, and despite numerous educational campaigns, only one resident utilized the service over three years. The Program was recently evaluated and it was confirmed that a mixed-model which included mobile and permanent collection centers as well as door-to-door service for the elderly and disabled is most convenient and cost-effective.

As stated above, AB 2371 would require jurisdictions to review their HHW programs and provide CalRecycle with results of the evaluation. Moreover, jurisdictions would also be required to include new methods resulting from the review as part of their annual report to CalRecycle. These requirements would needlessly place a burden on jurisdictions which already evaluate their programs for increased effectiveness in addition to providing data on an annual basis to CalRecycle and the Department of Toxic Substances Control. Moreover, each year several HHW information exchanges are held throughout the state where jurisdictions share their respective experiences and strategies related to managing successful HHW programs. **CalRecycle has been an active participant at these events and is thus already well positioned to understand the needs and overall approaches characteristic of such programs** (emphasis added).

The Task Force is concerned with the proposed definition of the term “more convenient” since it fails to consider factors such as costs, funding mechanism, new

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products that are continuously being introduced in the market, etc. The Task Force believes that the management of HHW should be a shared responsibility as local jurisdictions cannot fully address the needed capacity for proper disposal of HHW due to **continuous expansion of new products** which are manufactured with hazardous substances. The Task Force has long been a strong proponent of product stewardship/extended producer responsibility (EPR) which encourages manufacturers to take some responsibility for the management of their products at the end of their useful life. This responsibility incentivizes manufacturers to redesign their products in order to minimize difficult to manage waste. EPR redirects expensive waste management costs back on product manufacturers and users. AB 2371 would potentially be a step backwards, increasing the burden on local governments while avoiding real solutions of sharing the responsibility with product manufacturers (emphasis added).

Based on the foregoing, the Task Force is **opposed** to AB 2371. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



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

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cc: Assembly Member Kevin Mullin
Each Member of the Senate Environmental Quality Committee & Committee Consultant
Each Member of the Los Angeles County Legislative Delegation
California Product Stewardship Council
California State Association of Counties
League of California Cities
Each member of the Los Angeles County Board of Supervisors
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Integrated Waste Management Task Force