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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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February 23, 2017

Mr. Scott Smithline, Director  
California Department of Resources Recycling and Recovery  
1001 I Street  
Sacramento, CA 95812

Dear Mr. Smithline:

### **COMMENTS ON AB 901 THIRD DRAFT OF REPORTING REGULATIONS FOR DISPOSAL, DIVERSION AND ENFORCEMENT**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express its continued appreciation to the California Department of Resources Recycling and Recovery (CalRecycle) for soliciting input from public and local jurisdictions regarding draft regulations to implement Assembly Bill 901 (AB 901, Chapter 746 of the 2015 State Statutes). The Task Force has reviewed the third draft development regulations (Regulations), published by CalRecycle on February 10, 2017, and have the following specific comments.

1. Include the term “disaster debris” as a fourth definition of source sector (# 52) in Section 18815.2 on page 5 of the Regulations. Utilizing disaster debris as a source sector will be helpful in planning efforts during an emergency situation.
2. State the threshold for reporting for wastewater treatment plants discussed on page 6 in Section 18815.3 (b)(2)(E) on page 6 of the Regulations. It is not provided. A definition of wastewater treatment plants should also be included in Section 18815.2 of the Regulations.
3. Revise Section 18815.3 (k)(2) on page 7 of the Regulations to specify the specific form or means a reporting entity may utilize to notify CalRecycle it cannot determine whether a person receiving material is a reporting entity or an end user.
4. In Section X.7 (b) on page 9 of the second draft regulations, published on November 4, 2016, it is stated that a recycling or composting facility or operation that generates more than 100 tons of residuals sent for disposal per reporting period shall report as transfer station or material recovery facility. If this is still applicable, similar language should be included in Section 18815.7 of the Regulations.

5. Clarify the difference between mixed solid waste and mixed materials in Section 18815.9 (a) on page 13 of the Regulations.
6. In Section 18815.9 (c)(2) on page 14 of the Regulations, it is discussed that source sector may be determined by assigning side loading trucks as “contract-hauled single family residential,” and front and rear loading trucks as “contract-hauled single family.” This is not a precise way of determining source sector and data received in this manner may not be very useful. Since waste haulers maintain records on who their customer base is, we suggest that CalRecycle should require waste haulers to use these records.

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 the 88 cities in Los Angeles County with a combined population in excess of ten million. 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.

As a collective group responsible for ensuring a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force respectfully requests that CalRecycle consider and address the above comments.

If you have any questions, regarding this matter, please contact Mr. Mike Mohajer, a Member of the Task Force, at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Sincerely,



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

RB:ts

cc: CalRecycle (Ken DaRosa, Christine Hironake, John Sitts, Robert Carlson)  
Each Member of the Los Angeles County Integrated Waste Management  
Task Force