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SOLID WASTE MANAGEMENT COMMITTEE/
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March 4, 2009

Mr. John Fischer
Branch Chief, Waste and Toxics Planning
Massachusetts Dept. of Environmental Protection
1 Winter Street
Boston, MA 02108

Dear Mr. Fischer:

**COMMENTS REGARDING THE DECEMBER 2008 TELLUS INSTITUTE REPORT,
“ASSESSMENT OF MATERIALS MANAGEMENT OPTIONS FOR THE
MASSACHUSETTS SOLID WASTE MASTER PLAN REVIEW”**

The Los Angeles County Integrated Waste Management Task Force (Task Force) would like to comment on the report entitled, “*Assessment of Materials Management Options for the Massachusetts Solid Waste Master Plan Review*” (Assessment), developed on behalf of the Massachusetts Department of Environmental Protection by the Tellus Institute. Although the Assessment references Los Angeles County’s Phase II Conversion Technology Report (adopted in 2007), the Report’s findings are not adequately represented, and the conclusions in the Assessment seem inconsistent with our findings. As an entity that has expended significant resources in evaluating alternative solid waste management technologies, I hope we can be of assistance in your evaluation of these technologies and share the insight we have gained from our research efforts.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (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 (County) 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, the Los Angeles County Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

One distressing claim in the Assessment stated that “landfills with efficient gas-capture systems reduce two and a half times as much eCO₂ as gasification and pyrolysis facilities” (Executive Summary, page 3). This claim is in direct contradiction to several reports developed here in California, including the County’s Phase II Report, which found the use of conversion technologies to manage solid waste would significantly reduce emissions, including greenhouse gas (GHG) emissions as discussed below. We are concerned that the Assessment does not fully acknowledge the full range of demonstrated benefits of conversion technologies, such as the following:

1. **Conversion technologies can create green collar jobs and spur the economy** - Conversion technologies would create a range of new, high tech jobs and contribute to the local economy by creating new advanced infrastructure.
2. **Conversion technologies can decrease net air emissions and greenhouse gases** - In February 2008, California Air Resources Board’s Economic and Technology Advancement Advisory Committee (ETAAC) released its report entitled “*Technologies and Policies to Consider for Reducing Greenhouse Gas Emissions in California*”. The ETAAC Report noted 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. In fact, the Task Force estimates the potential GHG reduction of conversion technologies may be three times 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) elimination of methane production from waste that would otherwise be landfilled; and (3) displacement of the use of fossil fuels by net energy (fuel and electricity) produced by conversion technologies.
3. **Conversion technologies can produce renewable energy and green fuels, thereby reducing our dependence on foreign oil** - Conversion technologies produce fuel and/or energy. By utilizing conversion technologies, California, Massachusetts and other states can develop clean, locally-produced renewable energy and green fuels, including ethanol, biodiesel, and electricity, which can be used to promote energy independence. Benefits from this independence include insulating residents from energy markets fluctuations, and avoiding environmental impacts associated with the extraction, refining, transportation, and combustion of fuels.

4. **Conversion technologies are an effective and environmentally preferable alternative to landfilling** - Based on reports developed by the State of California Integrated Waste Management Board, the County of Los Angeles, and other independent agencies, conversion technologies are environmentally preferable to land disposal practices. Copies of these reports are available at www.SoCalConversion.org. While economically the cost of utilizing conversion technologies may exceed current landfill disposal rates in California, disposal costs are expected to increase as landfill capacity declines within the coming decade. Development of conversion technologies is needed now to provide decision makers with environmentally preferable and economically viable options for the management of post-recycled waste materials.

5. **Conversion technologies can manage materials that are not practically recyclable and at the same time create an incentive to increase recycling** - Not all solid waste currently disposed can be recycled or composted. Contaminated organic materials, higher number plastics and other materials, which cannot be recycled or processed in an economically feasible manner, are ideal feedstock for conversion technologies. At the same time, inorganic materials including glass, metals and aggregate have no value for conversion technologies, and therefore create an incentive to separate and recover those materials for recycling prior to the conversion process.

The Task Force believes conversion technologies are a very real and immediate solution to reducing the amount of waste going to landfills and diversifying our solid waste management system. For this reason, the County of Los Angeles has spent the last decade extensively evaluating conversion technology suppliers from around the world. After a careful vetting process, four companies were invited to submit proposals to develop a highly-efficient conversion technology demonstration facility onsite with a materials recovery facility. The goal of this unique project is to demonstrate the technical, environmental and economic benefits of conversion technologies, which have already demonstrated successful operation in Europe, Japan and other countries for many years.

By design, we have made our process as transparent as possible so as to provide a public resource to other communities considering conversion technologies, in order to avoid having to reinvent the wheel. In fact, our technical consultant for the second phase of our conversion technology evaluation – Alternative Resources, Inc. – is based

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in Massachusetts and would be a valuable resource to discuss the findings of Los Angeles County's Phase II Report in detail.

We look forward to the Assessment being revised to accurately reflect the current global status of conversion technologies and their potential environmental benefits, and would be happy to provide additional, specific information upon request to assist in this endeavor. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,

Margaret Clark

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

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cc: Each Member of the Los Angeles County Integrated Waste Management Task Force
Each Member of the Los Angeles County Alternative Technology Advisory Subcommittee
Alternative Resources, Inc (Jim Binder, Susan Higgins)