



DONALD L. WOLFE  
CHAIRMAN

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

November 1, 2005

Ms. Rosario Marin, Chair  
California Integrated Waste Management Board  
Cal-EPA Building  
1001 "I" Street  
Sacramento, CA 95812-4025

Dear Chairwoman Marin:

**CLASSIFICATION OF CONVERSION TECHNOLOGIES IN THE  
COUNTYWIDE SITING ELEMENT AMENDMENT PROCESS**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) is working with the County of Los Angeles to revise the Los Angeles County Countywide Siting Element (Siting Element). On **March 17, 2005**, we forwarded a letter to you requesting written guidance regarding the inclusion of conversion technology facilities in the Siting Element revision process (copy enclosed). Because time is of the essence, we are asking for a reply to our inquiry on whether or not the location of potential conversion technology facilities must be identified in the Siting Element.

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 by the County and the 88 cities in the County of Los Angeles. Consistent with these responsibilities and to ensure a coordinated and cost-effective solid waste management system, the Task Force addresses issues impacting the solid waste management system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, Los Angeles County Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

We are presently in the initial stage of developing a conversion technology demonstration facility in Southern California. Conversion technologies are an array of emerging technologies capable of managing post-recycled residual solid waste, and converting these materials into useful products, green fuels, and clean sources of energy. We believe these technologies have the potential to divert residual solid waste from landfilling and

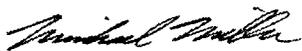
Ms. Rosario Marin  
November 1, 2005  
Page 2

incineration. Ending our dependence on dwindling landfills can revolutionize solid waste management in California.

At present, certain conversion technologies are categorized as solid waste disposal facilities, and under current regulations, solid waste disposal facilities must be listed in the Siting Element in order to be issued a Solid Waste Facility permit prior to its becoming operational. As you may know, we maintain that conversion technologies are not disposal facilities since they do not involve the final deposition of solid wastes onto land, into the atmosphere, or into the waters of the State, but rather convert solid waste into beneficial products, thus these technologies should not be required to be identified in the Siting Element. If a proposed technology facility, such as our demonstration facility, was considered a disposal facility, it would necessitate prior to development that either the project proponent or the County pay for amending the Siting Element. In the County of Los Angeles, amending the Siting Element is an expensive and lengthy process: estimated to take two years to complete at a cost of more than \$250,000. This process requires numerous public hearings and securing approval of a double majority of the 89 jurisdictions within the County (a majority of the jurisdictions with a majority of the population). Such a requirement can easily stifle the development of these emerging technologies. Since a number of conversion technology facilities are being considered or planned Statewide, we request the Waste Board provide written clarification to address this question.

We appreciate you looking into this important issue, since our Siting Element amendment process is currently underway. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Very truly yours,



Michael Miller, Vice-chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force  
Councilmember, City of West Covina

Enc.

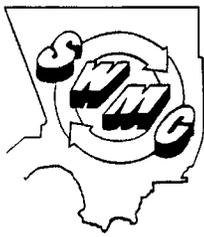
PA:ro

P:\eppub\Secfinal\Task Force\Letters\CTs in CSE.doc

cc: Governor Arnold Schwarzenegger  
Governor's Los Angeles Field Office  
Governor's Office of Legislative Affairs  
Assemblymember Barbara Mathews  
Cabinet Secretary (Terry Tamminen)

Ms. Rosario Marin  
November 1, 2005  
Page 3

Secretary of the California Environmental Protection Agency (Alan C. Lloyd)  
Each Member of the California Integrated Waste Management Board  
California Integrated Waste Management Board Executive Director (Mark Leary)  
Each Member of the County of Los Angeles Board of Supervisors  
Each City Mayor in the County of Los Angeles  
California State Association of Counties  
League of California Cities  
League of California Cities, Los Angeles County Division  
Southern California Association of Governments  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Solid Waste Association of North America  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Alternative Technology Advisory Subcommittee



DONALD L. WOLFE  
CHAIRMAN

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

March 17, 2005

Ms. Rosario Marin, Chair  
California Integrated Waste Management Board  
Cal-EPA Building  
1001 "I" Street  
Sacramento, CA 95812-4025

Dear Chairwoman Marin:

**CLASSIFICATION OF CONVERSION TECHNOLOGIES IN THE  
COUNTYWIDE SITING ELEMENT AMENDMENT PROCESS**

— The County of Los Angeles, in coordination with the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), is currently revising the Los Angeles County Countywide Siting Element (Siting Element). We are also in the process of analyzing the development of a conversion technology demonstration facility since we believe these technologies have the potential to divert residual solid waste from landfilling and incineration while converting these materials into useful products, fuels, and clean sources of energy.

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 by the County and the 88 cities in the County of Los Angeles. Consistent with these responsibilities and to ensure a coordinated and cost-effective solid waste management system, the Task Force addresses issues impacting the solid waste management system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities--Los Angeles County Division, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

At a recent Task Force meeting, questions were raised regarding whether or not the location of potential/proposed conversion technology facilities must be identified in the Siting Element. At present, conversion technologies are categorized as solid waste

Ms. Rosario Marin, Chair  
March 17, 2005  
Page 2

disposal facilities. Under current regulations, all solid waste disposal facilities must be listed in the Siting Element in order to be issued with a Solid Waste Facility permit prior to its becoming operational. As you may know, we maintain that conversion technologies are not disposal facilities and should not be required to be identified in the Siting Element. If a conversion technology facility is considered a disposal facility, it would necessitate the project proponent or the County to pay for amending the Siting Element which in the County of Los Angeles is a two-year process that costs approximately \$250,000. This expensive and time-consuming process would stifle the development of conversion technology facilities within the County of Los Angeles. Since a number of conversion technology facilities are being considered or planned, we request the Waste Board to provide a written clarification to address this question.

We look forward to your timely response, since our Siting Element amendment process is currently under way. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Very truly yours,



Michael Miller, Vice-chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force  
Councilmember, City of West Covina

VJ/CS:my  
P:\seclCSEltr

cc: Each Member of the California Integrated Waste Management Board  
Each Member of the County of Los Angeles Board of Supervisors  
Each City Mayor in the County of Los Angeles  
California State Association of Counties  
League of California Cities  
League of California Cities, Los Angeles County Division  
Southern California Association of Governments  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Solid Waste Association of North America  
Each Member of the Los Angeles County Integrated Waste Management Task Force