

# County of Yolo

DEPARTMENT OF COMMUNITY SERVICES  
DIVISION OF INTEGRATED WASTE MANAGEMENT

Taro Echiburú,  
DIRECTOR

44090 County Road 28H, Woodland, CA 95776  
(530) 666-8852 Fax (530) 666-8853 [www.yolocounty.org](http://www.yolocounty.org)

**MEETING DATE:** THURSDAY, March 28, 2019  
**TIME:** 2:30 p.m.  
**PLACE:** DIVISION OF INTEGRATED WASTE MANAGEMENT  
ADMINISTRATION BUILDING CONFERENCE ROOM  
44090 COUNTY ROAD 28H, WOODLAND, CA 95776

**Members:** Carol Scianna, Mike McDonald, Christine Crum, Kayla Rodriguez, David Powell, Larry Fisher, Michael Fan, Richard Tsai, Paulina Benner, Rosie Ledesma

## AGENDA

### 3. Introductions

#### Public Comment

An opportunity for members of the public to address the Waste Advisory Committee (WAC) on subjects relating to waste management. The Public Comment period is limited to 3 minutes per person, but no more than 10 minutes' total. If further time is needed the WAC may choose to continue discussion at the end of this meeting or place the topic on a future agenda.

#### Consent Agenda

1. Approve February Minutes

#### Regular Agenda

2. Chair and Vice Chair Elections
3. Member Updates – Yolo County, Cities of Davis, West Sacramento, Winters and Woodland; UC Davis and others
4. MAC (Meeting of Area Coordinators) Update
5. Resolution to Support Recycling Commission
6. SB 1383 letters
7. Member Questions

#### Member Questions

Opportunity for members of the Waste Advisory Committee to ask questions, but not to take action, on waste management issues not listed under either the Consent or Regular Agenda items.

I declare under penalty of perjury that the foregoing agenda was posted by or before March 21, 2019 by 12:00 p.m. on the bulletin board near the entrances of Yolo County Central Landfill at 44090 County Road 28H, Woodland, California.

Ramin Yazdani, Director

Division of Integrated Waste Management, Department of Community Services

#### **\*\*NOTICE\*\***

If requested, this agenda can be made available in appropriate alternative formats to persons with a disability, as required by Section 202 of the Americans with Disabilities Act of 1990 and the Federal Rules and Regulations adopted in implementation thereof. Persons seeking an alternative format should contact Ramin Yazdani, Director, for further information. In addition, a person with a disability who requires a modification or accommodation, including auxiliary aids or services, in order to participate in a public meeting should telephone or otherwise contact Ramin Yazdani preferably 24 hours prior to the meeting. Ramin Yazdani may be reached at (530) 666-8848, or at email [Ramin.Yazdani@yolocounty.org](mailto:Ramin.Yazdani@yolocounty.org), or at the following address: Yolo County Division of Integrated Waste Management, 44090 County Road 28H, Woodland, CA 95776



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February 28, 2019

Gwen Huff  
Materials Management and Local Assistance Division  
California Department of Resources Recycling and Recovery  
P.O. Box 4025  
Sacramento, CA 95812

Dear Ms. Huff,

While we support and appreciate the overarching goals of SB 1383 and are internally working to reduce landfill methane emissions by keeping organic materials out of the Yolo County Central Landfill, some of the proposed requirements, on how we achieve these goals, could pose significant and unnecessary rate increases to our constituents.

We would like to make the following recommendations to the draft language of SB 1383 to achieve these goals while minimizing costs:

1. Section 18984.1. Three Container Organic Waste Collection Service  
Comments: Implementation of a 3<sup>rd</sup> cart at a household is estimated to increase residential garbage bills by 40% (approximately \$15 more/month/household). The Division does not feel a majority of our constituents can absorb this type of rate increase and is therefore looking at alternate options to increase organics diversion such as self-haul coupon based programs and at exemptions for some of our rural communities that have a population density of less than 50 people per square mile. The County would like to see language that allows rural jurisdiction to maintain compliance with residential based organics recycling with other methods besides a curbside cart.
2. Section 18984.12 Waivers and Exemption Granted by the Department  
Comments: This section defines that population density of less than 50 people per square mile will be exempt however there has been debate on who will make this determination. The County requests that Cal Recycle develop a database specifically outlining which communities across the state will be exempted instead of putting this task on County staff.
3. Section 18989.1 Cal Green Building Codes  
Comments: This will increase county staff time needed beyond the current level of staffing to perform site visits to all businesses to document who can be exempted from the requirement of establishing a food waste program due to lack of trash enclosure space. CalRecycle should strike the language that requires past structures to comply and instead focus on new permits pulled after the effective date of this section.
4. Section 18990.2 Edible Food Recovery Standards and Policies.  
Comments: While efforts are already underway to work with the Yolo County Food Bank to support food recovery, the mechanism defined in this section to fund the implementation, compliance and enforcement of this program is lacking a direct connection to the waste industry. Food recovery by definition places this food in the category of a product not waste therefore it is not reasonable to ask that landfill tip fees, solid waste haulers or solid waste franchise fees be used to subsidize this program. We request that CalRecycle strike the language that references these funding sources and

1. Could you please verify if our interpretation is correct? In order for the County and its haulers to compile data and review it with accuracy we do not feel 30 days is sufficient. Could the reporting date in 2022 be moved to October 1<sup>st</sup>?
2. Also, it does not mention whether the normal Jan. 1, 2021-Dec. 31, 2021 data would need to be provided in the year 2022. Is this Jan.-June 2022 report in lieu of the calendar year report or is CalRecycle asking for two reports to be submitted in 2022?

10. Section 18994.2 Jurisdiction Annual Reporting

Comments: It is anticipated the level of reporting and preparing for this report will take a significant amount of time and attention on behalf of County Integrated Waste Management staff because we will not only be responsible for unincorporated County reporting, in several program areas, IWM staff will also be responsible for reporting on behalf of the cities (City of Woodland, West Sac, Winters and Davis) and UC Davis which all require outside agency coordination. The current "expectation" from CalRecycle over the past 4 years is that IWM staff provide updates and data throughout the year outside of what is required by law. It has been verbally communicated by the Local Area Market Development (LAMD) staff at CalRecycle that its intentions are the same under SB1383. County staff would be required to provide updates and data throughout the year however this section only requires it on an annual basis. Challenging the current requests has put County staff in a bad position with the regulator who oversees our compliance. They have agreed that it is not required by law to provide these extra reports but recommends that it is in the best interest of the County to do so, which has created a lot of extra work for staff. We are asking CalRecycle to clearly take a position on this issue and ask that language be added to account for the additional staff time required to compile these reports and data mid-year or as a County we let the language stand and stand firm that no additional reports or data will be provided outside of these written requirements.

11. Section 18995.1 Jurisdiction Inspection and Enforcement Requirements

Comments: Funding will need to be created to pay for a code enforcement officer to write citations for rural businesses that do not segregate out their organic food waste or establish a food recovery system through the Food Bank, regardless of economic hardship on the business to establish such programs. County staff is already working with the businesses subjected to AB1826 requirements and have found numerous challenges due to the cost of organics collection and processing. Now that the threshold has narrowed further, we will be working with even smaller rural businesses and farms to comply. SB1383 requires an enforcement mechanism which is not currently in place under AB1826 which we believe will push small business out of state or rather it will be cheaper to pay the fee than to pay for the actual collection services and therefore the penalty will become the norm. We would like CalRecycle to explain what they are doing to help minimize the cost of organics collection.

12. Section 18996.7 Department Enforcement Action Regarding Local Education Agencies

Comments: This section asks the County to issue a citation if an educational agency (ex. UC Davis, Knights Landing Charter School, Clarksburg Elementary, etc.), is not in compliance. However, under our solid waste franchise agreements where these programs are facilitated, the County nor our haulers (WM and Recology) have jurisdiction over educational agencies as they act independent. We currently report to the state if these educational agencies are in compliance and would continue to do so but do not feel we have the legal authority to impose fines on them and therefore this section should be eliminated.

13. Section 17896.25.1 Load checking – Contamination in Source Separated Organic Waste

Comments: The Yolo County Central Landfill will need to increase organics tip fees to allow for the increased staff time to monitor organics loads coming inbound to our digester and track contamination (trash mixed in with food waste). It is required that 2



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March 4, 2019

Gwen Huff  
Materials Management and Local Assistance Division  
California Department of Resources Recycling and Recovery  
P.O. Box 4025  
Sacramento, CA 95812      Via Email: [SLCP.Organics@calrecycle.ca.gov](mailto:SLCP.Organics@calrecycle.ca.gov)

Subject: *Comments on Short-lived Climate Pollutants: Organic Waste Reductions  
Proposed Regulation - Title 14 Division 7 and Title 27 Division 2  
Yolo County Central Landfill*

Dear Ms. Huff,

While we support and appreciate the overarching goals of SB 1383 and are internally working to reduce landfill methane emissions by keeping organic materials out of the Yolo County Central Landfill, some of the proposed requirements, on how we achieve these goals, could pose significant increases in costs for the landfill, and unnecessary rate increases to our constituents. This is a second comment letter and is focused primarily on items related to landfill operations.

We would like to make the following recommendations to the draft language of the SB 1383 regulation to achieve the goals of reducing the release of short-lived climate pollutants (SLCP) through the management of organic wastes, while minimizing costs:

***TITLE 14: NATURAL RESOURCES 4 DIVISION 7. DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY***

***Chapter 3. Minimum Standards for Solid Waste Handling and Disposal***

***Article 6.2 Operating Standards***

***Section 17409.5.2. Measuring Organic Waste Recovered from Mixed Waste Organic Collection Stream.***

***Section 17409.5.3. Measuring Organic Waste in Residuals Removed from Mixed Waste Organic Collection Stream.***

***Section 17409.5.4. Measuring Organic Waste Recovered from Source Separated Organic Waste Collection Stream.***

***Section 17409.5.5. Measuring Organic Waste in Residuals Removed from Source Separated Organic Waste Collection Stream.***

***Chapter 3.2. In-Vessel Digestion Operations and Facilities Regulatory Requirements***

***Article 3. Operating Standards for In-Vessel Digestion Operations and Facilities***

***Section 17896.44.1. Measuring Organic Waste in Residuals***

These above sections listed contain several requirements intended to quantify, on a daily basis, the amounts of organic waste at various process stages. We appreciate and agree with the goal of gaining better understanding of residue levels after processing, but we are unclear as to how this would result in reduction of SCLP emission. We suggest revising the section to state that the frequency, procedures, and sample sizes used in the testing involved in these sections

under the Methane Emissions from Municipal Solid Waste Landfills (Title 17 CCR 95460 to 95476) for surface methane emissions. The first corrective action taken in an area with emissions is to increase gas collection efficiency. Following this, if emissions are not reduced, the operators will adjust the intermediate cover (compaction, moisture conditioning, additional cover material, etc) to reduce SLCP emissions. This has been demonstrated to have the intended effect of reducing fugitive SLCP emissions.

Another method to reduce fugitive emissions that has been demonstrated to be effective is the use of biocover material. One such demonstration projects was funded by CalRecycle in 2011 ("Biocovers at Landfills for Methane Emissions Reduction Demonstration" Link: <https://www2.calrecycle.ca.gov/Publications/Details/1367> ) and published in Waste Management Journal in 2015 (Changgen Mei, Ramin Yazdani, Byunghyun Han, Erfan Mostafid, Jeff Chanton, Jean Vander Gheynst, Paul Imhoff (2015) "Performance of Green Waste Biocovers for Enhancing Methane Oxidation", Waste Management, 39, 205-215. This method can reduce the need for additional cover soil and maintain ideal condition for cover soil to reduce SLCP emissions. The biocover acts to prevent cracking, and maximize gas collection efficiency as demonstrated in this research study.

***Chapter 4. Documentation and Reporting for Regulatory Tiers, Permits, WDRs, and Plans***

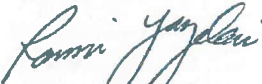
***Article 3.2. CalRecycle—Other Requirements***

***§21695. CalRecycle—Organic Disposal Reduction Status Impact Report***

The Organic Disposal Reduction Status Impact Report requires operator to prepare and submit a report after 180 days of the effective date of this regulation. YCCL recommends that this report be due two-years after the implementation of the regulation to allow adequate time for collection of supporting data the is required for the analysis under section 21695(c) (13 items listed).

Thank you for your consideration of these comments and suggestions.

Sincerely,



Ramin Yazdani, PhD, P.E.  
Director of Division of Integrated Waste Management  
Department of Community Services  
Yolo County