

1995

STATE OF CALIFORNIA

INTEGRATED WASTE MANAGEMENT BOARD

Reporting Year Tonnage Modification Request and Certification

(New 06-00)

To request a reporting year tonnage modification used in calculating the diversion rate for your jurisdiction, please complete and sign this form and return it to your Office of Local Assistance (OLA) representative at the address below, and any additional information requested by OLA staff. OLA staff will review your request as part of the Annual Report/Biennial Review process; therefore, it is recommended that this form be included as part of your Annual Report to the California Integrated Waste Management Board (Board.)

Please be advised that the Biennial Review is not only a review of whether a jurisdiction has met their diversion rate requirement, but also an evaluation of a jurisdiction's progress in implementing the selected programs identified in their Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element.

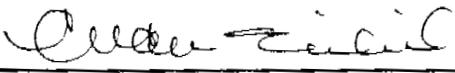
If you have any questions about the certification process, or how to fill out this form, please call your OLA representative at (916) 255-2555.

Mail completed documents to:

California Integrated Waste Management Board
Office of Local Assistance, MS-8
8800 Cal Center Drive
Sacramento, CA 95826

General Instructions:

Please complete both Section I and Section II, and all other applicable subsections.

Section I: Jurisdiction Information and Certification			
I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:			
Jurisdiction Name <i>County of Mono</i>		County <i>Mono</i>	
Authorized Signature 		Title <i>Assistant Director of Public Works</i>	
Type/Print Name of Person Signing <i>Evan Nikirk</i>	Date <i>7/31/00</i>	Phone <i>(760) 932-5252</i>	
Person Completing This Form (please print or type) <i>Jim Greco</i>	Title <i>Owner/Principal</i>	Phone <i>(916) 933-2327</i>	
Mailing Address <i>P.O. Box 5177</i>	City <i>El Dorado Hills</i>	State <i>CA</i>	ZIP Code <i>95762</i>

Section II: Information for Modification of Existing Reporting Year Tonnage

If requesting more than one type of reporting year tonnage modification, please copy Section II and complete all applicable subsections for each reporting year inaccuracy selected in A5.

A1. Reporting year to be corrected: 1995	A2. Current tonnage as reported to the CIWMB: 4,867	A3. Increased or decreased tons requested: + 8,343	A4. Proposed total reporting year generation tons requested: 13,210
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A5. Statute (PRC Section 41031-41033, 41331-41333), Regulation (14CCR Section 18722 et seq., 18800 et seq.), and Board Policy (modification methods as outlined in the March 27, 1997 Board-approved "Agenda Item 32") allow for reporting year tonnage modifications. Please state the nature of the reporting year tonnage inaccuracy. Check all that apply. (Information regarding the Statute, Regulation and "Agenda Item 32" are available on internet at <http://www.ciwmb.ca.gov/Law.htm>)

- Disposed waste actually generated in another jurisdiction.
- Disposal tonnage number miscalculated.
- Disposal mandated by federal or state agency policy, order, or contract.
- Non-hazardous designated waste tonnage modification. (Please also answer question A14 if you check this box.)
- Waste disposal from a declared disaster or public emergency.
- Waste exported out-of-state and later diverted.
- Residual waste from regional diversion facility. (Please reference PRC Section 41782, (a)(2)(A) for additional reporting year tonnage modification requirements.)
- Residual waste from regional medical waste treatment facility. (Please reference PRC Section 41782, (a)(1) for additional reporting year tonnage modification requirements.)
- Other reporting year tonnage inaccuracy not specifically outlined in statute, or "Agenda Item 32". Please explain in detail below, including your proposed tonnage modification method.

Disposal tonnage at Benton Crossing Landfill was under-reported. Per capita and comparative analysis re-inforced suspected under-reporting. BOE audit report confirmed under-reporting.

Derivation of increased disposal tons was uniformly applied to 5 other County-operated disposal sites.

A6. Does the inaccuracy checked in subsection A5 meet the statutory and regulatory criteria and definitions to qualify for a tonnage modification? Please explain your findings below.

Yes. Under-reported disposal tonnage was taken from wrong forms and applied to the quarterly disposal reporting system. Disposal sites did not have scales. BOE audit during 1995-1996 derived corrected tons.

A7. The combined documentation supporting this certification form contains the following:

- States problem claimed in section A5.
- States tonnage modification amount claimed.
- Totals add up to tonnage claimed in section A3.
- Address, title of entity, and signature of individual with knowledge regarding the tonnage modification.

Yes.

No, please explain in detail below.

A8. In the table below, list the data records that support your claim and are available for Board review. Include type of record and location; for example, weight tickets from transfer station or a signed letter on official letterhead indicating where the waste tonnage originated (i.e. jurisdiction-of-origin).

Source of Disposal Data	Tons	Type of Record	Location of Data
BOE (1995)	8,343	Audit report.	Monro County DPW
BOE (1996)	684	" "	" " "
Please see Section 3.0 of "Final Report for Compliance Order".			

A9. If the tonnage modification is due to misreporting or a miscalculation, how has the problem been resolved so that the error does not occur again?

Recently hired Assistant Director of Public Works, who is responsible for solid waste management, has developed a more accurate recordkeeping and reporting system.

A10. If the tonnage modification is being attributed to another jurisdiction or to a miscalculation, have you notified the affected parties (jurisdictions, haulers, counties, and landfill operators) in writing regarding the problem and your pending claim to the Board?

- Yes.
 No, please explain in detail below.
 N/A

A11. Please indicate from what documented source the tonnage requested in Box A3 came:

- All tons claimed are from actual documented numbers from hauler, self-haul, or other tonnage. *BOE, LF Operator*
 Some data were estimated or extrapolated from representative sampling. (Explain the amount and method in detail.)

A12. Enter your diversion rates in the table below.

Current Board default calculated diversion rate: Reporting Year: <i>1995</i>	<i>69</i> %
Proposed diversion rate:	<i>66</i> %

A13. If the proposed reporting year tonnage modification results in an increase in your waste diversion rate, please explain how your diversion rate is consistent with your level of SRRE program implementation. For example, does your new diversion percentage reflect the recycling and diversion programs you have implemented in your jurisdiction?

N/A

A14. In the space below please describe your efforts to divert the non-hazardous designated waste material prior to this tonnage modification request. (This question is only applicable if you checked the non-hazardous designated waste tonnage modification box in subsection A5.)

N/A

1996

OF CALIFORNIA

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Section I: Jurisdiction Information and Certification

I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:

Jurisdiction Name <i>County of Mono</i>		County <i>Mono</i>	
Authorized Signature 		Title <i>Assistant Director of Public Works</i>	
Type/Print Name of Person Signing <i>Evan Nikirk</i>	Date <i>7/31/00</i>	Phone <i>(760) 932-5252</i>	
Person Completing This Form (please print or type) <i>Jim Greco</i>	Title <i>Owner/Principal</i>	Phone <i>(916) 933-2327</i>	
Mailing Address <i>P.O. Box 5177</i>	City <i>El Dorado Hills</i>	State <i>CA</i>	ZIP Code <i>95762</i>

Section II: Information for Modification of Existing Reporting Year Tonnage

If requesting more than one type of reporting year tonnage modification, please copy Section II and complete all applicable subsections for each reporting year inaccuracy selected in A5.

A1. Reporting year to be corrected: <p style="text-align: center;">1996</p>	A2. Current tonnage as reported to the CIWMB: <p style="text-align: center;">9,328</p>	A3. Increased or decreased tons requested: <p style="text-align: center;">684</p>	A4. Proposed total reporting year generation tons requested: <p style="text-align: center;">10,012</p>
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A5. Statute (PRC Section 41031-41033, 41331-41333), Regulation (14CCR Section 18722 et seq., 18800 et seq), and Board Policy (modification methods as outlined in the March 27, 1997 Board-approved "Agenda Item 32") allow for reporting year tonnage modifications. Please state the nature of the reporting year tonnage inaccuracy. Check all that apply. *(Information regarding the Statute, Regulation and "Agenda Item 32" are available on internet at <http://www.ciwmb.ca.gov/Law.htm>)*

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Disposal tonnage number miscalculated.

Disposal mandated by federal or state agency policy, order, or contract.

Non-hazardous designated waste tonnage modification. (Please also answer question A14 if you check this box.)

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Waste exported out-of-state and later diverted.

Residual waste from regional diversion facility. (Please reference PRC Section 41782. (a)(2)(A) for additional reporting year tonnage modification requirements.)

Residual waste from regional medical waste treatment facility. (Please reference PRC Section 41782. (a)(1) for additional reporting year tonnage modification requirements.)

Other reporting year tonnage inaccuracy not specifically outlined in statute, or "Agenda Item 32". Please explain in detail below, including your proposed tonnage modification method.

A6. Does the inaccuracy checked in subsection A5 meet the statutory and regulatory criteria and definitions to qualify for a tonnage modification? Please explain your findings below.

Yes. Under-reported disposal tonnage was taken from wrong forms and applied to the quarterly disposal reporting system. Disposal sites did not have scales. BOE audit during 1995-1996 derived corrected tons.

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- Address, title of entity, and signature of individual with knowledge regarding the tonnage modification.

Yes.

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Source of Disposal Data	Tons	Type of Record	Location of Data
BOE (1995)	8,343	Audit report.	Wano County DPW
BOE (1996)	684	" "	" " "
Please see section 3.0 of "Final Report for Compliance Order".			

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A10. If the tonnage modification is being attributed to another jurisdiction or to a miscalculation, have you notified the affected parties (jurisdictions, haulers, counties, and landfill operators) in writing regarding the problem and your pending claim to the Board?

Yes.

No, please explain in detail below.

N/A

A11. Please indicate from what documented source the tonnage requested in Box A3 came:

All tons claimed are from actual documented numbers from hauler, self-haul, or other tonnage. *BOE, LE Operator*

Some data were estimated or extrapolated from representative sampling. (Explain the amount and method in detail.)

A12. Enter your diversion rates in the table below.

Current Board default calculated diversion rate:	
Reporting Year: <u>1996</u>	41 %
Proposed diversion rate:	43 %

A13. If the proposed reporting year tonnage modification results in an increase in your waste diversion rate, please explain how your diversion rate is consistent with your level of SRRE program implementation. For example, does your new diversion percentage reflect the recycling and diversion programs you have implemented in your jurisdiction?

For example, does your new diversion percentage reflect the recycling and diversion programs you have implemented in your jurisdiction?

N/A

A14. In the space below please describe your efforts to divert the non-hazardous designated waste material prior to this tonnage modification request. (This question is only applicable if you checked the non-hazardous designated waste tonnage modification box in subsection A5.)

N/A

3.0 CORRECTIONS TO INACCURATE DISPOSAL REPORTING

OVERVIEW

Figure 1 shows the location of the disposal sites in the county.

The County was coordinating its fulfillment of the Compliance Order with the Town of Mammoth Lakes when California Waste Associates (CWA) was advised that the Town of Mammoth Lakes has a year-round resident population base of about 5,300. However, because of the influx of skiers and visitors to Mammoth Mountain, the equivalent year-round population is approximately 17,000 according to the Mammoth Community Water District. A similar impact is associated with the unincorporated county population although it is not as significant.

CWA was reviewing the Town's demographics when it determined that the base year waste generation, though yielding a high per capita generation rate for both the Town and the County, was not the source of the inaccuracies in diversion measurement. On the contrary, CWA's analysis inferred that perhaps the base year waste generation was accurate and that the measurement problem may be due to inaccurate disposal tonnage allocation.

ANALYSIS OF REPORTED DISPOSAL TONNAGE

Scales were installed at the Benton Crossing Landfill in mid-1998. The operator began recording received disposal tonnage in September, 1998. Prior to that time the volume of waste disposed was estimated and a conversion factor (1,000 pounds per cubic yard) was used to calculate tons. Volume is still the basis for determining disposal quantities at the County's other disposal facilities.

Table 3-1 depicts the estimated base year disposal tonnage and the disposal tonnage recorded by the CIWMB in its Quarterly Disposal Reporting System (QDRS) for the years 1995 through 1999. All of the Town's disposal tonnage was disposed at the Benton Crossing Landfill. This landfill also received some waste from unincorporated areas of the county in the vicinity of the landfill. The data for each quarter as recorded by the CIWMB in its website is included in Appendix C.

Table 3-1. Reported Disposal Tonnage for Mono County at the BCLF for the Period 1995 - 1999

Period	1995	1996	1997	1998	1999
1st Quarter	39	108	25	213	286
2nd Quarter	79	262	250	335	178
3rd Quarter	50	518	299	308	368
4th Quarter	126	551	244	235	764
Total Disposal	294	1,439	818	1,091	1,596
Measurement Basis : Quantity Estimated by Volume and Converted to Tons				Started Weighing in 9/98	

The disposal data presented in Table 3-1 for 1995 was compared to 1996. The comparison reveals the unrealistically low 1995 reported tonnage. This trend was also observed for the other County-operated landfills for 1995 and 1996. This prompted further review. Consequently, the disposal data for 1995 was scrutinized further.

Table 3-2 depicts the disposal tonnage reported to the Board of Equalization (BOE) by quarter for 1995 and 1996. The BOE data came from the CIWMB website. Pages from the website which show the disposal tonnage initially recorded for the Benton Crossing Landfill is included in Appendix D.

Table 3-2. Disposal Tonnage Recorded by CIWMB from Initial BOE Reports with Percentage Allocations Derived by County for the Benton Crossing Landfill in 1995 and 1996

Period	1995				1996			
	Total	County	Town	% County	Total	County	Town	% County
1st Quarter	779	39	740	5%	2,167	108	2,059	5%
2nd Quarter	1,572	79	1,493	5%	5,230	262	4,969	5%
3rd Quarter	1,000	50	950	5%	5,180	518	4,662	10%
4th Quarter	2,526	126	2,400	5%	4,235	551	3,684	13%
Total	5,877	294	5,583	5%	16,812	1,439	15,374	9%

This disposal tonnage was further allocated by the Public Works Department according to the Jurisdiction Allocation (JA) Forms between the Town and the unincorporated county area surrounding the Town. For six consecutive quarters the percentage of the waste received at the Benton Crossing Landfill allocated to the County was 5%. The percentage increases in the last two quarters of 1996 to 10% and 13%, respectively.

The JA Forms are included in Appendix E.

The SRRE for Mono County (dated July 1992) reported that it had been estimated that approximately 90% of the municipal solid waste, construction and slash waste, and other special wastes entering the Benton Crossing Landfill were generated within Town limits.

The JA Forms were completed by using data recorded by the landfill operator from "waste origin forms". The operator conducted waste origin surveys during the standard survey weeks (the 8th through the 14th of the last month in each quarter). The forms for all four quarters of 1995 are presented in Appendix F.

The data is compiled in Table 3-3.

Table 3-3. Disposal Tonnage Recorded by Benton Crossing Landfill Operator from Origin Surveys in 1995 and 1996

Period	1995				1996			
	Total	County	Town	% County	Total	County	Town	% Town
1st Quarter	5,150	573	4,577	11%		NA *	NA *	
2nd Quarter	4,273	122	4,151	3%		NA *	NA *	
3rd Quarter	5,265	436	4,829	8%		NA *	NA *	
4th Quarter	6,271	773	5,498	12%		NA *	NA *	
Total	20,959	1,904	19,055	9%				

* NA - Not Available.

The disposal weights recorded in the origin survey forms differed significantly from the JA Forms and what was recorded by the CIWMB in its QDRS.

Additional research into the estimated disposal received at the Benton Crossing Landfill revealed that the BOE conducted an audit of the Benton Crossing Landfill from the 2nd quarter of 1994 through the 4th quarter of 1996. Table 3-4 compares the reported BOE disposal quantities, the audit results, and the origin survey data.

The BOE Audit report is included in Appendix G.

Table 3-4. Comparison of BOE Audit with Previously Reported Tons and the Origin Survey Results (Benton Crossing Landfill)

Period	1995			1996		
	Previously Reported to BOE	BOE Audit	Origin Survey	Previously Reported to BOE	BOE Audit	Origin Survey
1st Quarter	779	4,298	5,150	2,167	3,760	NA *
2nd Quarter	1,572	4,948	4,273	5,230	4,868	NA *
3rd Quarter	1,000	3,652	5,265	5,180	5,306	NA *
4th Quarter	2,526	4,848	6,271	4,235	4,335	NA *
Total	5,877	17,746	20,959	16,812	18,269	NA *

* NA - Not Available.

The BOE audit disposal tonnage results and the origin survey week allocation percentages (for the County and the Town) for 1995 were used to determine the proposed disposal tonnages for the County and the Town for 1995. The percentage allocation rates identified in Table 3-2 (from the County's QDR's) were used for deriving the proposed disposal quantities for 1996. Table 3-5 presents the results.

**Table 3-5. Proposed Disposal Quantities for the County and the Town for 1995 and 1996
(Benton Crossing Landfill)**

Period	1995				1996			
	Total	County	Town	% County	Total	County	Town	% Town
1st Quarter	4,298	473	3,825	11%	3,760	188	3,572	5%
2nd Quarter	4,948	148	4,800	3%	4,868	243	4,625	5%
3rd Quarter	3,652	292	3,360	8%	5,306	531	4,775	10%
4th Quarter	4,848	582	4,266	12%	4,335	564	3,771	13%
Total	17,746	1,495	16,251	8%	18,269	1,526	16,743	8%

County Public Works Department staff indicated that the other landfills which received solid waste during 1995 and 1996 were similarly under-reported. However, BOE did not choose to audit these other sites.

The previously reported disposal tons and the proposed revised disposal tons for the Benton Crossing Landfill are included in Table 3-6. A percentage change was calculated for 1995 and 1996.

Wastes generated from other parts of the county are delivered to other landfills in and outside the County from the unincorporated areas. The percentage increase derived in Table 3-6 was used to correct the reported disposal tonnage at the other County landfills. The corrected 1995 and 1996 disposal tonnages for the Benton, Bridgeport, Chalfant, Pumice Valley, and Walker landfills are presented in Tables 3-7 through 3-11.

Table 3-6. Comparison of Previously Reported Disposal vs Corrected Disposal at the BCLF (1995-1996)

Reporting Characterization	1995	1996
Previously Reported Disposal Tonnage	5,877	16,812
Corrected Disposal Tonnage (per BOE Audit)	17,746	18,269
Difference (Increase)	11,869	1,457
Percentage Change	202.0%	8.7%

Table 3-7. Derivation of Corrected Disposal at the Benton LF for 1995-1996

Reporting Characterization	1995	1996
Previously Reported Disposal Tonnage	655	260
Percentage Change (based on BOE Audit of BCLF)	202.0%	8.7%
Corrected Disposal Tonnage	1,978	283

Table 3-8. Derivation of Corrected Disposal at the Bridgeport LF for 1995-1996

Reporting Characterization	1995	1996
Previously Reported Disposal Tonnage	459	622
Percentage Change (based on BOE Audit of BCLF)	202.0%	8.7%
Corrected Disposal Tonnage	1,386	676

Table 3-9. Derivation of Corrected Disposal at the Chalfant LF for 1995-1996

Reporting Characterization	1995	1996
Previously Reported Disposal Tonnage	468	324
Percentage Change (based on BOE Audit of BCLF)	202.0%	8.7%
Corrected Disposal Tonnage	1,413	352

Table 3-10. Derivation of Corrected Disposal at the Pumice Valley LF for 1995-1996

Reporting Characterization	1995	1996
Previously Reported Disposal Tonnage	1,202	3,968
Percentage Change (based on BOE Audit of BCLF)	202.0%	8.7%
Corrected Disposal Tonnage	3,630	4,313

Table 3-11. Derivation of Corrected Disposal at the Walker LF for 1995-1996

Reporting Characterization	1995	1996
Previously Reported Disposal Tonnage	752	1,695
Percentage Change (based on BOE Audit of BCLF)	202.0%	8.7%
Corrected Disposal Tonnage	2,271	1,842

The County began to operate limited volume transfer stations at the Benton, Bridgeport, Chalfant, and Walker landfills in stages throughout 1998.

Additionally, corrected disposal information was developed for the allocation of tonnage between the County and the Town for 1999 at the Benton Crossing Landfill. This proposed correction is depicted in Table 3-12. Source data by quarter for each County landfill is included in Appendix H.

Table 3-12. Corrected Disposal Tonnage for Mono County for 1999

Disposal Site	Previously Reported for 1999	Quarter				Corrected 1999 Total Tonnage
		1st	2nd	3rd	4th	
Benton	4	1	1	1	1	4
Benton Crossing	1,596	481	358	597	1,065	2,501
Bridgeport	265	1	3	3	258	265
Chalfant	4	1	1	1	1	4
Pumice Valley	5,537	949	1,788	1,760	1,040	5,537
Walker	370	1	2	2	365	370

Table 3-13 presents the corrected disposed waste tonnage allocated to the County from all reported sources.

Table 3-13. Corrected Disposal Tonnage for Mono County for the Period 1995 - 1999

Disposal Site	1991	1995	1996	1997	1998	1999
Arvin	n/a	0	0	0	0	10
Benton	n/a	300 1,978	200 283	630	110	4
Benton Crossing	n/a	1,495	1,526	793	1,091	2,501
Bridgeport	n/a	400 1,386	200 676	1,114	1,099	265
Chalfant	n/a	400 1,413	200 352	1,141	233	4
Forward	n/a	0	0	0	203	4
June Lake	n/a	0	0	233	0	0
Mono Co Coleville	n/a	0	0	129	0	0
Pumice Valley	n/a	1200 3,630	1000 4,313	3,772	3,531	5,537
Walker	n/a	700 2,271	100 1,842	1,222	1,958	369
Exported	n/a	1,037	1,020	0	0	0
Total Disposal	13,506	6000 13,210	1000 10,012	9,034	8,225	8,694

The diversion rates using these disposal quantities are presented in Section 5.0.

*n/a
5/2/01*