



September 12, 2016

Mr. Robert Carlson
California Department of Resources Recycling and Recovery
AB901.Reporting@CalRecycle.ca.gov

Dear Mr. Carlson,

Orange County Waste & Recycling appreciates CalRecycle's recent workshops and the opportunity to comment on the Draft of reporting Regulations for Disposal, Diversion & Enforcement published on June 24, 2016. Orange County Waste & Recycling operates three landfills and four household hazardous waste collection centers. Between our facilities we receive material from over 100 jurisdictions throughout Southern California.

OC Waste & Recycling respectfully submits the following comments on the proposed regulations:

1. Reporting Duplications

Section X.2, Definition (a)(27) of "Material category" identifies (G) "Targeted products" including electronics, household batteries and architectural paint. These items are currently reported to CalRecycle as required by Title 14, Division 7, Chapter 9, and Section 1875.12. Reporting materials in numerous reports will result in increased costs due to staff time and may increase the opportunity for reporting errors.

2. Providing Sufficient Time to Develop Reporting Software

Existing computer software systems are not set up to accommodate recording tonnage by the five source sectors. It will take at least 18 to 24 months after the regulations have been finalized to develop new software and implement the new reporting system. Delaying the initiation of the new reporting structure will help to ensure that facilities have the capability to successfully collect the required data.

Landfill operators, such as the County of Orange, will need sufficient time to determine the necessary changes to be made to the existing reporting systems, procure a software vendor to make these upgrades, and train both staff and customers how to report new information. Sector allocations may not be captured at the fee booths for loads from multiple sectors. Therefore, many more customers will need to submit month/quarter-end reports to the landfills in order to provide sector data. These changes will require additional administrative time and customer training.

These system upgrades will be costly and may not be included in existing operator budgets.

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3. Reporting Deadlines

Setting landfill reporting deadlines at least 30 days, instead of 15 days, after the reporting deadline for transfer stations would assist the landfills in submitting more complete, accurate reports. Landfills are dependent on the transfer station reports in order to prepare their own reports. Section X.3, Section (d) identifies a 45-day reporting window after the end of the reporting period for disposal facilities, and a 30-day window for all other reporting entities.

Orange County currently must obtain over 100 customer reports each quarter in order to submit the current quarterly reports to CalRecycle, and this number will increase under the new regulations. Haulers and transfer stations with loads from multiple jurisdictions provide allocation data by month. The new sector reporting will require additional customers to submit monthly detailed reports, as fee booths are not equipped to handle detailed load allocations by city and sector. Landfills can only report to CalRecycle data provided by its customers. We are unable to generate missing data if the customers' data is incomplete or inaccurate. Providing sufficient time to review the numerous submitted reports and ensure that all have been received will improve reporting accuracy, and limit subsequent adjustments to complete or correct disposal reports.

If you have any questions regarding this matter, please contact me at Lisa.Keating@ocwr.ocgov.com or at (714) 834-5513.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Keating".

Lisa Keating
Manager, Contract, Program and Legislative Support