



**WESTERN PLACER**  
WASTE MANAGEMENT AUTHORITY

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September 12, 2016

Mr. Robert Carlson  
California Department of Resources Recycling and Recovery  
[AB901.Reporting@CalRecycle.ca.gov](mailto:AB901.Reporting@CalRecycle.ca.gov)

**RE: COMMENTS ON AB 901 DRAFT DEVELOPMENTAL REGULATIONS FOR DISPOSAL, DIVERSION AND ENFORCEMENT**

Dear Mr. Carlson,

The Western Placer Waste Management Authority (WPWMA) 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. The WPWMA is a joint powers authority comprised of Placer County and the cities of Roseville, Rocklin and Lincoln. The WPWMA provides recycling and waste disposal services to these communities as well as the cities of Auburn and Colfax and the Town of Loomis.

The WPWMA operates a Materials Recovery Facility (MRF) designed to separate, process and market recyclable materials removed from the mixed solid waste stream. Residuals are disposed at the WPWMA's Western Regional Sanitary Landfill which is collocated with the MRF. Greenwaste is processed and composted at the MRF's 75,000 cubic yard capacity compost facility. The WPWMA's MRF operator, Nortech Waste, LLC, is responsible for marketing all recyclable and organic products recovered and/or produced at the facility.

The WPWMA respectfully submits its concerns and requests clarification on the following sections of the proposed regulation:

1. Section X.2 – Definitions

Definition (a)(27) of "Material category" identifies (G) "Targeted products" including electronics, household batteries and architectural paint. The WPWMA currently reports these materials to CalRecycle as required by Title 14, Division 7, Chapter 9, Section 18751.2. CalRecycle staff noted in one of the recent workshops that these products were included in hopes of gathering more accurate data on their disposal. We are concerned that various facilities reporting materials in numerous reports will not only be redundant, but could also increase opportunities for reporting errors and inconsistencies rather than resulting in more accurate data collection. Reporting data in multiple reports will also result in additional staff time and cost investments for facility operators.

Definition (a)(40), "Source Sector" identifies five potential generation categories. The WPWMA's current scalehouse software does not readily allow for capture of that information and would require additional administrative effort, training, software support, etc., all with additional associated costs. Additional information input at the scalehouse could be time consuming and result in operational interruptions. It is

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also conceivable that hauler routes may include numerous source sectors, detail on which would be difficult to capture accurately and consistently upon arrival at the facility's scalehouse. Source sector data may be better reported directly to CalRecycle by haulers who know their customer base and where the waste is generated.

## 2. Section X.3 – Registration, Reporting and Exemptions

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. Section (f) allows for a facility with multiple operations to file a single report but does not specify a reporting deadline/window. We request that this section be clarified to specify the reporting period for facilities with more than one operation. We also recommend that the reporting window be longer than 45 days for disposal facilities and other reporting entities, as they may be relying on data from numerous haulers which could delay reporting efforts.

While not explicitly identified, the draft regulations allude to quarterly reporting. The additional information required to be reported will result in additional staff time and cost for both the WPWMA and our operator. We recommend that reporting be required annually or no more frequently than semi-annually.

Section (g) allows facilities to use "reasonable" conversion factors when unable to determine the weight of a material subject to reporting. We request that this section be revised to clarify if CalRecycle will establish conversion factors, or if this will be left to individual facilities to establish. For the sake of consistency, we recommend that material conversion factors be uniform across facilities and prescribed by CalRecycle.

## 3. Section X.7 – Reporting Requirements for Recycling and Composting Operations

Section (a)(1) requires reporting of all solid waste and/or residuals sent offsite for disposal. The WPWMA's MRF is collocated with our landfill. We request that this section be clarified to state that reporting needs to occur for materials sent for disposal, not only offsite disposal.

We appreciate your consideration of these comments and proposed revisions. Should you have any questions, please contact me at [eoddo@placer.ca.gov](mailto:eoddo@placer.ca.gov) or (916) 543-3984.

Sincerely,



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Eric Oddo  
Environmental Engineering Program Manager