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To: Fernando Berton
California Integrated Waste Management Board
1003 I Street, PO Box 4025
Sacramento, CA 95812

February 15, 2005

RE: Comments on Draft Conversion Technologies Report to the Legislature

Dear Mr. Berton,

The Northern California Recycling Association is a trade association with a membership comprised of 200 individuals representing recycling professionals working in private, nonprofit, and government agencies. We submit the following comments on the CIWMB's Draft Conversion Technologies Report to the Legislature:

Gasification. Pyrolysis, Plasma Arc:

NCRA considers gasification, pyrolysis, plasma arc, and other high temperature technologies to be forms of municipal solid waste incineration. NCRA supports the CIWMB's recommendation that these types of Conversion Technologies should not count as diversion towards AB 939 requirements.

Furthermore, NCRA strongly opposes all forms of incineration as a waste management strategy for the following reasons:

- These are not zero waste/zero emission technologies as purported to be and inevitably result in hazardous gaseous, solid, and liquid emissions. Furthermore, the unpredictable and inhomogeneous nature of using MSW as a feedstock makes it difficult to control or minimize these emissions.
- The primary materials CT targets for energy "recovery" paper, wood, and organics are more effectively recovered through proven technologies such as composting and recycling. NCRA asserts that the energy produced by these forms of Conversion Technologies is only a fraction of what can be recovered by recycling these materials into new products.

The report tends to compare "conversion technologies vs. landfilling" as if these currently wasted organic materials could not be diverted to recycling and composting. NCRA questions this assumption. Investment in these technologies will actually hamper the states ability to increase recycling of valuable waste streams (p.65), yet only recycling, not incineration, will increase the conservation of natural resources.

The CIWMB should be pursuing methods to improve the recycling programs for these materials instead of pursuing new forms of incineration. Additionally, if the CIWMB is

seeking truly innovative strategies for residual plastic wastes, NCRA recommends it should start down the path of producer responsibility for these materials.

Anaerobic Digestion:

The draft report on Conversion Technologies does not properly evaluate the different types of anaerobic digestion or its byproducts so it is difficult to draw conclusions about its efficacy. NCRA recommends the CIWMB compare anaerobic digestion and hydrolysis to current composting approaches and discuss the solid outputs of anaerobic digestion.

Reexamining the Conversion Technology Umbrella

It is confusing to address these disparate technologies under one label. NC.RA urges the CIWMB to discard the general term “Conversion Technology” and address each technology separately, or as groups of similar technologies with similar processes.

Sincerely,

Heidi Melander
NCRA President