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April 26, 2016

Mr. Robert Krieger  
California Air Resources Board  
Emissions Assessment Branch  
P.O. Box 2815  
Sacramento, CA 95812

Dear Mr. Krieger:

**COMMENTS ON DRAFT METHOD FOR ESTIMATING GREENHOUSE GAS EMISSION REDUCTIONS FROM DIVERSION OF ORGANIC WASTE FROM LANDFILLS TO COMPOST FACILITIES – DATED MARCH 2016**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our appreciation to the California Air Resources Board (CARB) for providing the opportunity to comment on the Draft Method for Estimating Greenhouse Gas Emission Reductions from Diversion of Organic Waste from Landfills to Compost Facilities.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

We have reviewed the Draft Method for Estimating Greenhouse Gas Emission Reductions from Diversion of Organic Waste from Landfills to Compost Facilities and offer the following:

- As indicated on page 4 of the Draft, in order to determine process emissions from the composting process, California-specific data sources for this parameter were

obtained from personal communication with CalRecycle staff. More specific information should be provided in order to explain how the data sources for this parameter were determined by CalRecycle staff.

- It is unclear how it was determined that landfilling and composting are considered to be functionally equivalent with regards to transportation emissions, as stated on page 11 of the Draft. Table 1 of the document shows feedstock collection (inbound) and compost delivery (outbound) transportation distances. For the San Diego composting facility, no outbound transportation distance is provided. Therefore, it is implied that feedstock is being brought into the facility and the resulting compost is land-applied at the same facility. If this is in fact the case, this facility may not be representative of most composting facilities in the state of California and should not be included in the calculation of transportation emissions contributing to total composting emissions. Furthermore, the transportation distances for landfilling were not accounted for when comparing transportation emissions for landfilling and composting. Instead, a factor of unknown source was used for estimated transportation emissions per ton of waste was used to estimate transportation emissions for landfilling. The analysis of transportation emissions should account for the distances traveled by waste hauling vehicles to collect and transfer organic waste to landfill in California.
- Table 5 of the Draft shows that one overall value is calculated for total composting emissions. However, Table 10 shows that three different values are calculated for total composting emission reductions based on feedstock type – food waste, yard trimmings, and mixed organics. The total composting emissions for each feedstock type should be calculated separately and compared to composting emission reductions. In addition to providing a more consistent analysis, this would result in a more accurate calculation of the final compost emission reduction factor. Although the transportation and process emissions for each feedstock type would be approximately equivalent, the fugitive emissions from food waste, yard trimmings, and mixed organics would likely vary at least somewhat.
- In the analysis of emissions reduction benefits of reduced fertilizer use from compost application, numerical values are provided in Table 8 of the Draft with little explanation, other than “personal communication,” of how the benefits were calculated. A more detailed explanation of how the emissions reduction benefits were determined should be provided and substantiated.
- The erosion and water use results were extrapolated from laboratory-scale experiments as opposed to macro scale field methods, and extrapolating the data may skew the results, as stated on pages 21-22. CARB and CalRecycle need to conduct at least a field-scale study of composting emissions reductions that would be specific to California climate and soil conditions. Furthermore, due to the large

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uncertainty associated with each factor used to calculate the compost emission reduction factor, CARB and CalRecycle should consider conducting detailed field studies to calculate a California-specific compost emission reduction factor.

- In light of prolonged drought conditions in California, it would be beneficial for CARB and CalRecycle to consider a study including GHG emission reduction benefits directly resulting from decreased water usage due to compost application, not just the GHG emission reduction benefits due to increased erosion control.

We hope that these issues will be addressed in the final Method for Estimating Greenhouse Gas Emission Reductions from Diversion of Organic Waste from Landfills to Compost Facilities.

Should you have any questions regarding these comments, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor, City of Rosemead

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cc: California Air Resources Board (David Mallory, Michael Tollstrup)  
CalRecycle (Scott Smithline, Christine Hironaka, Howard Levenson)  
League of California Cities  
League of California Cities, Los Angeles Division  
California State Association of Counties  
Each Member of the Los Angeles County Board of Supervisors  
Each City Mayor/Manager in the County of Los Angeles  
South Coast Air Quality Management District  
South Bay Cities Council of Governments  
San Gabriel Valley Council of Governments  
Gateway Cities Counsel of Governments  
Southern California Association of Governments (Carl Morehouse and Huasha Liu)  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Integrated Waste Management Task Force  
Each Member of the Alternative Technology Advisory Subcommittee  
Each Member of the Facility Plan Review Subcommittee