

Is Green Waste as ADC a Total Waste?

Real recycling has diverted millions of tons of green waste from landfilling over the past decade. Local government, haulers, and composters were pioneers as more than 520 curbside collection programs for green waste were instituted during the 1990's. Although more tons are being collected, the growth of processing infrastructure to produce market products from the collected material has shrunk over the past five years, according to a recent Waste Board study. Serious questions are being asked by the Waste Board as they look at whether use of green waste on certain landfills has become a TOTAL WASTE.

Explosion of landfill ADC use: Of the 22 million tons of organics collected each year, about six million is kept out of the landfill. The outlets for these tons are: agriculture (as compost or mulch), energy (as biofuel), or cover material for landfill (as "alternative daily cover" or ADC). The use of green waste as ADC has grown from about 1.4 million tons in 1999 to over 4.3 million tons in 2000. On July 25, 2001 at Long Beach, the time finally came for the ADC discussion at the Waste Board. After number-crunching the first 2000 disposal reports, IWMB staff released the results of investigations by the Board into nine landfills. In short, Waste Management, Inc. and Norcal were alleged to be ADC abusers and LA and Orange county-operated landfills look OK.

Board Determines Inert Landfills Are Disposal: For LA County Inert disposal facilities (Nu-Way Live Oak Landfill and Cal Mat Reliance Pit #2), the Board determination is consistent with past Board decisions. All material disposed at these landfills should be counted as disposal and none should be counted as beneficial use or ADC. Staff will revise the disposal numbers for 2000 to remove all tonnages reported as ADC and add those tonnages to the amounts disposed by each jurisdiction. The Board had taken previous action in 1993 to include inert tonnage as disposal in base-year calculations. The Board accomplished this by approving the Los Angeles fix to include waste disposal at all permitted inert facilities. The uncodified provisions of the Senate Bill 515 (Statutes 1999, Chapter 600) says an exemption from the \$1.34/ton state disposal fee will not impact what counts as disposal and diversion. The Board reports that about \$10 million in fees to run their programs has been lost (about \$3 million to one national company). In July, the Board determined that all permitted inert landfill disposal tonnage continue to be reported as disposal by these landfills. As a result of this determination, some jurisdictions will experience reduced diversion rates.

Misreported ADC Claims at Landfills: Board staff were directed to work with Los Angeles County and Orange County staff and the operators of their landfills to correct the ADC amounts reported in 2000 to correctly represent ADC types

and tonnages used at these facilities. This misreporting will not affect the disposal amounts reported nor the diversion rates of affected jurisdictions. Discussion of ADC Policy: The Board directed staff to revise Local Enforcement Agency (LEA) Advisory No. 48 to improve ADC monitoring and reporting for assessing potential overuse and to provide additional guidance on acceptable use of construction and demolition debris as ADC. This position was recommended by Edgar & Associates since 1998.

Updated LEA Advisory contents: The existing advisory requires a level of processing (for green waste at 3" minus). In addition, new standards established by the American Society for Testing and Standards (ASTM) for managing ADC at facilities should be included in the updated LEA Advisory. A level of processing for all ADC types (e.g. to 3" minus) should be required in order to achieve uniform application as well as prevent voids in the landfill cover. We believe that this standard would prevent the misuse of green waste and other ADC's as has been seen especially in the north state.

New Guidance to LEAs on C&D as ADC: During August 2001, Waste Board staff issued a new guidance memo to all LEA's requiring a mechanical processing of construction and demolition debris to 12 inches or smaller. A September 25th workshop has been scheduled at Sacramento for stakeholders to work with Board staff on the content of the upcoming Advisory. We will keep you posted on these efforts.

Why the "Real Recycler" should care: The upside of expanded use of ADC is that diversion goals are met (in some cases almost effortlessly). The downside of a greater than three-fold jump in green waste ADC from 1999 to 2000 is not only the loss of a sustainable compost industry, but serves to devalue investments in real diversion facilities. If it is cheap and provides unlimited diversion, what's the worry? If the day comes when the public fully understands that the green waste barrel that they so dutifully put out at the curb each week (because it doesn't belong in the landfill) ends up in the landfill anyway, heads will roll. Let's all join hands and pray that your investments in programs that deliver real tons and real results aren't labeled a TOTAL WASTE.

Sean R. Edgar
CORC Policy Director
Edgar & Associates, Inc.
Sacramento, CA.