


REQUEST FOR APPROVAL

To: Margo Reid Brown
Director

From: Mark Leary 
Deputy Director

Request Date: July 12, 2010

Decision Subject: Covered Electronic Waste Recycling Fee

Action By: July 27, 2010

Summary of Request: The Electronic Waste Recycling Act of 2003 (Public Resources Code 42460, et seq) establishes a financing mechanism intended to develop an infrastructure to provide convenient recycling opportunities and reduce the inappropriate disposal of certain electronic products discarded in California. This financing mechanism is funded by a covered electronic waste recycling fee that is assessed on consumers at the time of retail purchase of a new covered electronic device.

Pursuant to PRC 42464(f), CalRecycle has the responsibility to annually assess the adequacy of the covered electronic waste recycling fee to generate sufficient revenues to fund the operation and administration of the covered electronic waste (CEW) recycling program and all other provisions of the Act. CalRecycle must determine by the statutory date of August 1, 2010, whether any fee adjustments are necessary. Any adjustments made to the fee levels would take effect on January 1, 2011.

Recommendation: Based on an assessment of CEW recovery and recycling trends to estimate possible payment obligations, and of covered electronic device sales trends to project revenue potential, and of program related State agency operational costs demands, and taking into consideration available fund reserves, staff recommends that the covered electronic waste recycling fee be adjusted and returned to the levels initially established by the Electronic Waste Recycling Act of 2003 and originally codified in PRC 42464(a):

- **Six dollars (\$6)** for each covered electronic device with a screen size of less than 15 inches measured diagonally.
- **Eight dollars (\$8)** for each covered electronic device with a screen size greater than or equal to 15 inches but less than 35 inches measured diagonally.
- **Ten dollars (\$10)** for each covered electronic device with a screen size greater than or equal to 35 inches measured diagonally.

Upon approval of this recommendation, staff will work with the CalRecycle Legal Office to promulgate emergency regulations, as authorized by PRC 42475.2, so that the new fee levels are reflected in Title 14 of the California Code of Regulations, section 18660.40.

Director Action: On the basis of the information, analysis, and findings in this Request for Approval, I hereby approve the staff recommendation outlined above that the electronic waste recycling fee levels be returned to the levels initially set in the Electronic Waste Recycling Act of 2003 and, in doing so, fulfill CalRecycle's obligations pursuant to PRC 42464(f) to adjust the fee as necessary to ensure operational solvency and maintain prudent reserves.

Dated:

7/26/10



Margo Reid Brown
Director

Attachments:

1. Background and Summary of Program Costs and Revenue Need Considerations
2. Historical CEW Recycling Claim Volumes
3. Fee Model and Analysis

Covered Electronic Waste Recycling Program
Background and Summary of Program Costs and Revenue Need Considerations

The Electronic Waste Recycling Act of 2003 (Act), as amended, established a comprehensive program to finance the end-of-life management of certain (covered) electronic devices. The program is financed through an Electronic Waste Recycling Fee (fee) paid by consumers at the point of retail sale of new covered electronic devices. Accumulated funds are used to administer the programs established by the Act, including the disbursement of recovery and recycling payments to approved collectors and recyclers of covered electronic waste (CEW).

CalRecycle has the responsibility to evaluate the program's revenue needs annually and to adjust the fee levels as warranted to maintain fund solvency and ensure continued operation of the program. CalRecycle must make necessary determinations regarding the fee by the statutory date of August 1, 2010. Any changes would become effective on January 1, 2011.

The current fee assignments are as follows:

- **Eight dollars (\$8)** for each covered electronic device with a screen size greater than 4 inches but less than 15 inches measured diagonally.
- **Sixteen dollars (\$16)** for each covered electronic device with a screen size greater than or equal to 15 inches but less than 35 inches measured diagonally.
- **Twenty five dollars (\$25)** for each covered electronic device with a screen size greater than or equal to 35 inches measured diagonally.

Covered electronic devices are defined by statute as video display devices with a screen size greater than four inches that are identified by the Department of Toxic Substances Control (DTSC) after testing determines that they are hazardous when disposed. Currently, covered electronic devices include:

- Cathode ray tubes (CRT) and CRT-containing devices (including CRT televisions and computer monitors);
- Liquid Crystal Display (LCD) containing televisions and monitors;
- Laptop computers containing LCD screens;
- Gas plasma display televisions; and
- Personal DVD players.

Monies paid by consumers are remitted by retailers to the Board of Equalization (BOE) and deposited in the Electronic Waste and Recovery and Recycling Account (EWRRRA). The EWRRRA was established by the Act within the Integrated Waste Management Fund. While the EWRRRA is used to pay for the specific program operations of CalRecycle, DTSC, BOE, and some State Controller's Office (SCO) payment services, the vast majority of expenditure demand comes from electronic waste recycling payment claims submitted by recyclers.

The CEW recovery and recycling system has fostered a robust collection and processing infrastructure for a problematic waste stream. However the growth of the fund reserve within the program, due to revenues outpacing the volume of recycling payment claims, is at a level where CalRecycle must exercise its statutory authority to adjust fee levels to better balance revenue and expenditures, while still maintaining fiscal integrity within the program and remaining prepared for challenges ahead.

Specifically, CalRecycle must consider:

- How much expenditure demand can be expected in the near-future?
- How much revenue is necessary to ensure continued program solvency?
- What are covered electronic device sales projections?
- How should any changes in the fee be structured to best achieve adequate and stable revenue levels?

Revenue and Expenditures

California's covered electronic waste recovery and recycling payment system is financed through a fee that is assessed on the retail sale of covered electronic devices. The fee level was initially set via the Act at \$6, \$8, and \$10, depending on the screen size of the device. In early 2008 it was projected that payment claim demands would exceed revenue and exhaust the existing fund balance at some point in FY 2008/09. These projections were based on the historical pace of program growth, the original recovery and recycling payment rates, and the level of revenue anticipated from new device sales trends.

The California Integrated Waste Management Board (CIWMB) acted in June 2008 to adjust upward the consumer fee levels, pursuant to statutory provisions, to a new range of \$8, \$16, and \$25, aligned with the existing three-tiered screen size structure. This adjustment was determined to be appropriate at the time based on historical growth in claim volumes submitted by recyclers.

Until mid-2008, the program had been growing at the average rate of an additional four million pounds of CEW claimed each quarter. However, contrary to the continued growth that was factored into predicting revenue need for the 2008 fee adjustments, CEW claim volumes unexpectedly fell in the latter part of 2008, peaked again in first quarter 2009, and then declined somewhat afterward. Please refer to Attachment 2 for a graphic depiction of historical quarter-to-quarter program volumes and a brief discussion of factors affecting CEW recycling rates.

Since program inception, CalRecycle has received more than 1660 claims totaling in excess of \$360 million. This represents the recovery and recycling of ~808 million pounds of CEW. However, even with the substantial volumes of CEW recovered and recycled, the excess revenue

derived from the current consumer fee is accumulating in a reserve that now needs to be stabilized and reduced through an adjustment to the fee levels.

Historical and projected program revenues are as follows:

- FY 2004/05: ~\$ 31,000,000
- FY 2005/06: ~\$ 78,000,000
- FY 2006/07: ~\$ 80,000,000
- FY 2007/08: ~\$ 77,000,000
- FY 2008/09: ~\$108,000,000
- FY 2009/10: ~\$140,000,000 (projected)
- FY 2010/11: ~\$143,000,000 (projected if no adjustments are made)

Fee Levels: Maintaining Solvency

As CalRecycle administers the financial aspects of the CEW payment system, it is obligated to maintain a fund balance that allows it to make recovery and recycling payments, as well as to provide funding for its own program specific operations and certain operations of both DTSC and BOE. CalRecycle has the authority and responsibility to revisit and revise fee levels annually, as warranted, to maintain adequate funds in the EWRRA. The next opportunity to do so is on or before August 1, 2010.

CalRecycle's specific authority is contained in Public Resources Code section 42464(f):

“On or before August 1, 2005, and, thereafter, no more frequently than annually, and no less frequently than biennially, the board (CalRecycle), in collaboration with the department (DTSC), shall review, at a public hearing, the covered electronic waste recycling fee and shall make any adjustments to the fee to ensure that there are sufficient revenues in the account to fund the covered electronic waste recycling program established pursuant to this chapter. Adjustments to the fee that are made on or before August 1, shall apply to the calendar year beginning the following January 1. The board shall base an adjustment of the covered electronic waste recycling fee on both of the following factors:

(1) The sufficiency, and any surplus, of revenues in the account to fund the collection, consolidation, and recycling of covered electronic waste that is projected to be recycled in the state.

(2) The sufficiency of revenues in the account for the board and the department to administer, enforce, and promote the program established pursuant to this chapter, plus a prudent reserve not to exceed 5 percent of the amount in the account.”

As noted earlier in this document, the current level of CEW recycling payment claim demands compared to annual revenue has resulted in the accumulation of a significant fund reserve. This reserve will continue to accumulate within the EWRRRA unless action is taken to adjust the fee. Informing the consideration of fee adjustment will be an estimation of expenditure demands balanced with the potential for revenue generation. Expenditure estimates can be based on projected claim volume and payment rates, as well as State agency operational requirements. Revenue potential can be calculated based on the projected sales of covered devices, both in overall number and in the distribution between screen size categories.

Additional Factors in Reserve and Fee Considerations

The Governor's Proposed Budget for FY 2010/11 indicates a starting reserve balance in the EWRRRA of approximately \$87 million and an ending reserve balance of approximately \$138 million, assuming current revenue and expenditure rates. However, as part of the recent Governor's Revised Budget for FY 2010/11, a two-year loan of \$75 million has been proposed from the EWRRRA reserve to the General Fund.

As of the drafting of this background and summary attachment, it is most prudent to assume that the \$75 million loan will be made. It is also prudent to plan for the contingency that the loan may not be repaid in the timeframe originally anticipated. Therefore any fee adjustment considerations should not rely upon the necessity of loan repayment to maintain program solvency and instead treat future loan repayment as an additional opportunity to further adjust fee levels. In the meantime, fee levels should be calculated based on available reserves and what revenue is necessary to keep the program solvent until such time as loaned funds can be repaid.

The Mechanics of Adjusting Fee Levels

CalRecycle has the authority to adjust, pursuant to timeframes and considerations contained in statute, the fee assessed on consumers. Adjustments to the fee would be considered regulations under the Administrative Procedures Act (APA). CalRecycle has authority to make such adjustments pursuant to an emergency rulemaking. Public Resources Code Section 42475.2 grants CalRecycle the authority to promulgate all regulations under the Act as emergency regulations that remain in effect for two years. This timeframe will allow any fee changes to remain in effect until the next time CalRecycle is authorized to revisit and revise them.

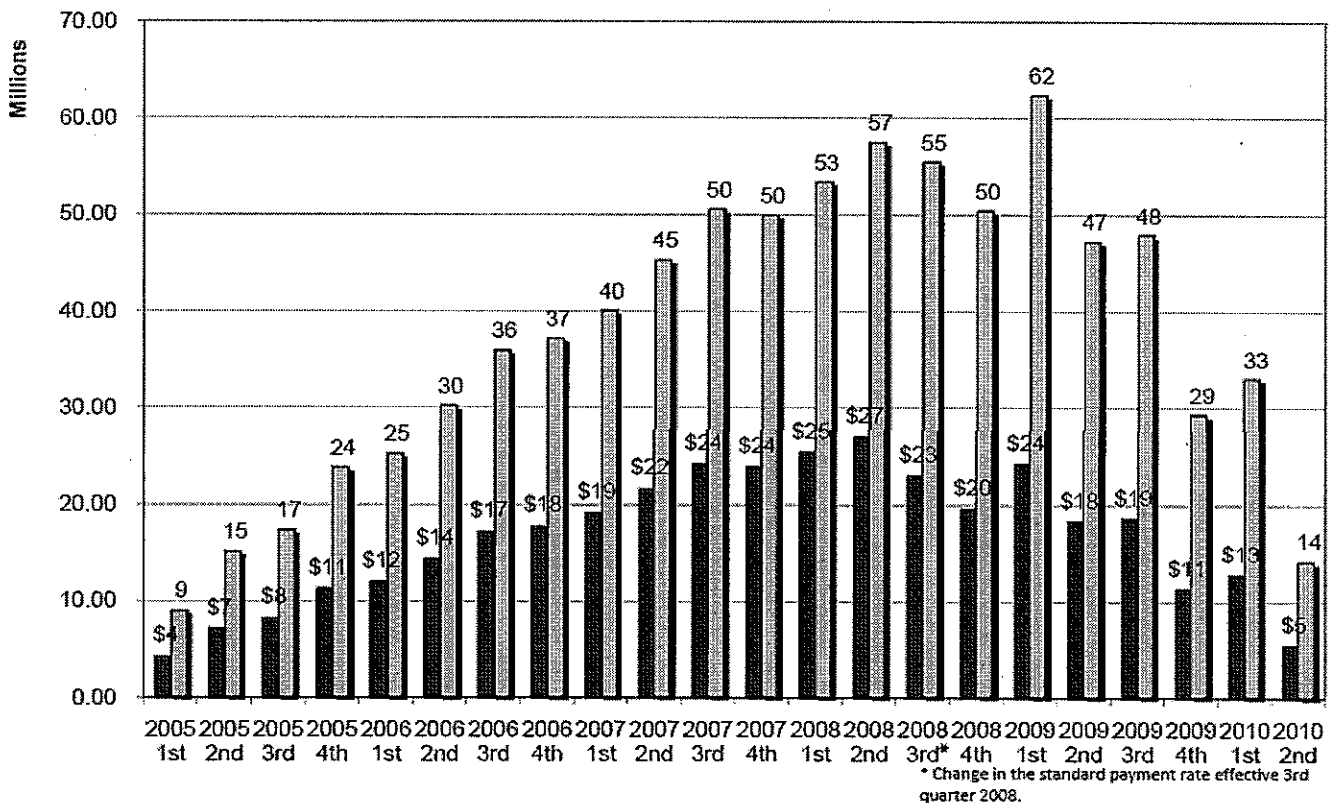
Upon CalRecycle's approval of any adjusted fee levels, program staff would work with the Legal Office to prepare emergency regulations and submit the package to the Office of Administrative Law (OAL).

Covered Electronic Waste Recycling Program - Historical CEW Recycling Claim Volumes

CalRecycle tracks the volume of covered electronic waste (CEW) recovered and recycled within the program through data submitted along with recycling payment claims. The depiction of claim volumes in the below chart reflects the general growth trends of the program since its inception in January 2005. Factors affecting the fluctuating volumes in recent quarters include a lowered payment rate (effective July 2008), economic uncertainty, the digital television transition in first half of 2009, and the widespread availability of recycling opportunities over the past five years that may have cleaned out much of the available stockpile.

Most significantly, in October 2009, cathode ray tube (CRT) glass market disruptions involving Mexican destinations began significantly impacting the number of claims submitted since 4th quarter 2009. (A condition of submitting a payment claim is that all CRT glass derived from recycling CEW is shipped to an authorized destination.) However, participating collectors and recyclers have continued overall CEW recovery and recycling activities and a significant volume of processed CEW has yet to be claimed. These pending program costs must be factored into any revenue need, fund reserve, and fee level considerations.

**Covered Electronic Waste Recycling Payment System
 Quarterly Monies and Pounds Claimed**
 (as of July 8, 2010)



Note: Recyclers are technically required to submit claims within 45 days of the end of a claim reporting month, which leads to a delay in the tracking of program volumes. For instance, June 2010 claims aren't due until August 15, 2010. However, it is not uncommon for other market complication to delay the timely submittal of a recycling payment claim. CalRecycle has discretion whether to accept claims submitted beyond 45 days.

Covered Electronic Waste Recycling Program – Fee Model and Analysis

The Electronic Waste Recycling Act (Act) requires CalRecycle to review and to adjust, as necessary, the covered electronic waste recycling fee (fee) that funds the covered electronic waste (CEW) recycling program provided for by the Act. The fee is paid by consumers at the time of retail purchase of a new covered electronic device (CED), and is remitted to the State via the Board of Equalization. CalRecycle must annually assure that sufficient revenue is realized from the fee to make CEW recovery and recycling payments to approved CEW collectors and recyclers, as well as fund specific functions at State agencies (CalRecycle, Department of Toxic Substances Control, Board of Equalization, and State Controller's Office) that administer the Act.

Due to recent trends in the volume of CEW recovered, recycled, and claimed within the program, the Electronic Waste Recovery and Recycling Account (EWRRA) is facing a markedly different solvency challenge than it did in FY 2008/09, when the threat of exhaustion was real and authority for an emergency loan was secured as a back-up contingency. Today the EWRRA contains excess reserves that must be responsibly reduced through an adjustment to the current fee levels. Decisions on the degree of adjustment must be made before August 1, 2010, to meet statutory deadlines, with the new fee levels taking effect on January 1, 2011.

Table 1, presented on the following page, models the fiscal effects of a proposed fee structure of \$6, \$8, and \$10, which are the fee levels initially established by the Act. The model assumes certain variables, most of which remain generally constant over time for the purpose of analysis. It is acknowledged that, while CalRecycle has some degree of control over certain of the assumed variables, such as the recovery and recycling payment rate that can be reset biennially, other variables can only be speculated.

Variables assumed to remain constant (due to lack of available information indicating otherwise) include the projected volume of CED sales (approximately 9.5 million units annually – based on data reported along with most recent fee remittals from retailers) and the mix of screen-sizes that will be sold. Another potential variable that does not change in the model is the projected volume of CEW managed through the program (approximately 200 million pounds annually).

The model incorporates the current CEW combined recovery and recycling payment rate of \$0.39 per pound as readopted by CalRecycle in June 2010. The model also presumes the goal of continued fund solvency assurance through FY 1012/13, while working toward achieving a 5% prudent reserve provided for by statute (PRC 42464(f)(2)).

Program revenues change in the middle of FY 2010/11 when the new fee structure would take effect. The model presumes a targeted average per CED unit revenue level that results in the described impacts on the condition of the EWRRA through FY 2012/13. (The average per CED unit revenue level has been approximately \$14.85 under the current \$8, \$16, and \$25 fee level and historical CED sales volume.)

Also indicated in later years is the repayment to the EWRRA of funds proposed to be loaned to the General Fund and the Integrated Waste Management Account. However, the ability of the General Fund to make this loan repayment in a timely fashion is a consideration factored into why the EWRRA reserve is targeted for measured reductions instead of drastic cuts.

The model presented in Table 1 shows that a return to the \$6, \$8, and \$10 fee structure will responsibly reduce the EWRRA fund reserve within a relatively short period of time, while allowing for contingencies in the event of unexpected fiscal developments. The ability of CalRecycle to adjust the fee annually, as necessary, provides significant flexibility in fulfilling statutory obligations and ensuring program solvency by selecting fiscally prudent options in the near-term.

Proposed Adjustments to the Fee Structure

The following table presents the fiscal effect of a proposed fee structure of \$6, \$8, and \$10, which are the fee levels initially established by the Act. This model is intended to illustrate fund condition evolution under assumed program administration costs, anticipated loans, CEW recovery and recycling volumes, prevailing recycling payment rates, and CED sales. Initial fund conditions are aligned with fiscal data contained in the Governor’s Proposed Budget for FY 2010/11. The model assumes adherence to the existing three-tiered fee levels within established CED screen sizes categories (4” to <15”, 15” to <35”, and 35” or greater).

Table 1

Fiscal Year	Devices Sold	Avg Fee Revenue per Device	Revenues	Recycling Payments	All Other Expenditures	Loans to GF & IWMA, Repayments	Fund Balance at Year End
FY 2009/10 (includes loan to GF)	9,431	\$ 14.85	\$ 140,000	\$ (80,000)	\$ (11,112)	\$ (75,000)	\$ 38,352
FY 2010/11 (includes loan to IWMA)	9,619	\$ 11.43*	\$ 109,945	\$ (80,386)	\$ (11,571)	\$ (1,543)	\$ 28,685
FY 2011/12	9,619	\$ 8.00	\$ 76,952	\$ (80,386)	\$ (11,571)	\$ -	\$ 13,680
FY 2012/13 (includes loan repayments)	9,619	\$ 8.00	\$ 76,952	\$ (80,386)	\$ (11,571)	\$ 76,543	\$ 75,218

Note: Within the above table, all figures are presented in terms of thousands, except for amount of average revenue per device sold. (6 mos at \$14.85 / 6 mos at \$8)*

Assumptions:

- No Growth in Pounds of CEW Recovered / Recycled: Volumes stay flat at approximately 200 million pounds per year
- Number of Devices Sold to Remain Constant: 9,619,000 per year (sales reported with recent fee remittals)
- Loan to General Fund from EWRRRA: \$ 75,000,000 (scheduled repayment in FY 2012/13)
- Targeted Average Revenue per Device (beginning 1/1/11): \$ 8.00 (based on projected percentages sold per CED size category, less 3% retailer withhold)
- Combined Recovery and Recycling Payment: \$ 0.39 per pound

Covered Electronic Waste Recycling Program – Public Comments on Proposed Fee Adjustments

CalRecycle has received the following comments since posting its proposal to adjust the covered electronic waste recycling fee (fee) back to the levels initially established in the Electronic Waste Recycling Act of 2003 (Act). This fee is paid by consumers at the time of retail sale of new covered electronic devices and is used to fund the administration of provisions of the Act, including the disbursement of recovery and recycling payments to approved collectors and recyclers of covered electronic waste (CEW). The proposed fee adjustment was announced through a listserv distribution on July 12, 2010, and discussed at a public meeting on July 14, 2010.

Comment (received via e-mail):

“I would suggest not reducing the fee; all the items currently being sold will come back and need to be recycled. The excess current funds should be prudently invested so they are there in the future when money needs to be paid out for recycling.”

Program Response:

California’s electronic waste recycling program model is often erroneously referred to as an advanced recycling fee, or ARF. This label incorrectly gives the impression that funds collected today will be banked for use when the device upon which the fee was assessed has reached the end of its useful life. In fact, the funds accumulated from the sale of covered devices today are used immediately to pay for the recovery and recycling of CEW being generated today. Statute limits the reserve that can be maintained.

Comment (received via e-mail):

“I would strongly disagree with the intent to reduce the fees on new electronic devices because there is now a surplus in the fund for ewaste recycling. Why on earth would one attempt to change a successful program? An increase in payments amounts to collectors and recyclers would further encourage correct ewaste recycling, and yield the originally intended results of decreasing toxics and ewaste in our landfills. Why not maintain the surplus as is, or slightly increase the payout amounts? Or the surplus could be used to implement a similar program encouraging correct recycling of more dangerous toxics such as batteries.”

Program Response:

CEW payment rates are set by CalRecycle biennially based on average net costs to recover and recycle CEW. It is assumed that these costs are incurred through the correct and compliant management of this waste stream. The revenue to fund the CEW program is derived from the fee assessed on covered electronic devices, which are video display devices with a screen-size of four inches or greater and that have been determined by the Department of Toxic Substances Control to exhibit the characteristics of a hazardous waste when disposed. Although many types of electronic waste are disposed, the CEW recovery and recycling payment system may only pay for the collection and recycling of discarded covered electronic devices.

Comment (offered at July 14 MMLA meeting):

Hewlett Packard – Supports the concept of reducing the excess EWRRRA reserve through a measured reduction in the consumer fees. Recognizes that excess fund reserves create the potential for borrowing, which the stakeholder does not support. Prefers not to have wild swings of fee decreases and increases over time.

Program Response:

Noted.

Comment (offered at July 14 MMLA meeting):

Californians Against Waste (CAW) – Supports the concept of reducing the excess EWRRA reserve through a measured reduction in the consumer fees. Suggests that the fee on larger screen devices be proportionally higher than the other screen-size tiers, since the cost to recycle discarded large screen devices is higher.

Program Response:

Statute provides little guidance on how to apportion the fee across covered electronic devices. Public Resources Code section 424264(f) simply states that Calrecycle “shall base an adjustment of the covered electronic waste recycling fee on both of the following factors:

(1) The sufficiency, and any surplus, of revenues in the account to fund the collection, consolidation, and recycling of covered electronic waste that is projected to be recycled in the state.

(2) The sufficiency of revenues in the account for the board and the department to administer, enforce, and promote the program established pursuant to this chapter, plus a prudent reserve not to exceed 5 percent of the amount in the account.”

Since the devices upon which the fee is initially levied will be subject to entirely different recycling costs and conditions when they are discarded in the years ahead, CalRecycle should strive in the present primarily to establish a fee structure that ensures a stable revenue base for tactical program operations.

Comment (received via e-mail, summarized):

Consumer Electronics Association / Best Buy – CEA shared electronic device sales projections prorated to California. Their calculated revenue projections using the proposed fee levels were fairly close what CalRecycle used in its fund condition modeling. They support the concept of reducing the excess EWRRA reserve through a reduction in the consumer fees.

Program Response:

Thank you.

**Alternative Daily Cover (ADC)
Demonstration Project Guidance
Stakeholder Workshop**

Waste Compliance and Mitigation
Program Monthly Public Meeting
August 9, 2010

Strategic Directive 8.3

Staff review of CalRecycle regulations in light of current science, market issues, & applicable technologies.

Staff developed ADC White Paper in 2009

Board directed staff to develop ADC demonstration project guidance to evaluate newly proposed materials to be used as ADC

Landfill Daily Cover

Operators must cover all disposed solid waste at the end of each day to control odors, vectors, fires, litter, and scavenging.

Minimum of 6" of compacted earthen material or

Alternative cover materials of alternative thickness (ADC) at the end of each operating day

(Title 27 California Code of Regulations Section 20680)

ADC Material Types in Regulation

Title 27 CCR 20690 (b) (1-11)

1. Geosynthetic Fabric or Panel Products (Blankets)
2. Foam Products
3. Processed Green Material
4. Sludge and Sludge-Derived Materials
5. Ash and Cement Kiln Dust Materials
6. Treated Auto Shredder Waste
7. Contaminated Sediment, Dredge Spoils, Foundry Sands, Energy Resource Exploration & Production Wastes
8. Compost Materials
9. Processed Construction & Demolition Wastes & Materials (C&D)
10. Shredded Tires
11. Spray Applied Cementitious Products

If a landfill operator proposes to use an ADC material not included in regulation:

Site-specific demonstration project is required

Operator must complete a successful ADC demonstration project as approved by the Enforcement Agency (EA) with concurrence of CalRecycle

Upon completion of a successful demonstration project, the operator can request the EA to allow the ongoing use of ADC material

Many stakeholders have indicated:

ADC demonstration projects have been dependent primarily on visual observations

No statewide standardized evaluation methodology of ADC demonstrations

Need guidance on how to design & implement ADC demonstration projects

ADC Demonstration Project Guidance

CalRecycle staff, in consultation with LEA's and other stakeholders, are developing a draft ADC demonstration guidance document

Document will assist landfill operators & LEA's in developing, implementing, and documenting ADC demonstration projects

ADC demonstration guidance premises:

Performance of ADC material will be compared to the performance of compacted earthen material (dirt) at the site

If ADC material does not perform as well as the dirt cover at the site, the ADC material would not pass

Evaluate pre-processing, stockpile management, and other activities associated with the use of ADC material

Evaluate greenhouse gas emissions of ADC material compared to dirt cover at the site, including material collection, storage, processing, transportation etc.

ADC demonstration guidance premises

Operator is responsible for:

- developing a proposal
- seeking LEA approval
- implementing & evaluating demo
- submitting final report to LEA

LEA is responsible for:

- reviewing & requesting adjustments to the proposal before approving demonstration
- monitoring the operator's implementation and evaluation methodologies
- conducting direct evaluation of ADC performance if warranted
- reviewing and approving the final report

ADC Evaluation - Flies

Test Methodology

Establish baseline for the site

Fly surveys (Scudder fly grill)

- 10 counts (including crawlers) near attractants on dirt
- 5 highest counts averaged
- species composition survey

Use same methods during ADC use

Performance Evaluation

Fly count ADC / Fly count dirt = 1 or <1

No change in species composition

ADC Evaluation- Odors

Testing Methodology

Establish baseline for site

Phase 1 - Number of confirmed odors utilizing AQMD-type protocols when using dirt

Phase 2 - Return to dirt cover – establish baseline for sources and compounds using odor detection and evaluation technology

Monitor sources and compounds when using ADC

Performance Evaluation

of complaints with ADC / # of complaints with dirt = 1 or <1 (Phase 1)

If >1, then compare source and characteristic with baseline (Phase 2)

If ADC is source and compounds are odorous, then ADC fails odors evaluation

Next Steps

- Input on premises
- Complete draft guidance
- Review and comment on draft guidance
- Pilot guidance
- Finalized guidance

Comments & Suggestions

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