

Appendix G

Summary of Public Input

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This appendix summarizes the public input process and comments received as this study progressed. There were two distinct opportunities for public input:²

- A focus group meeting held at the outset of the project to receive comments on the proposed methodology; and
- A workshop held near the end of the study to receive input on draft preliminary findings.

The following three sections briefly summarize (1) the August 2003 focus group meeting, (2) the April 15 workshop, and (3) the major themes reflected in public comments on the study's preliminary findings. Subsequent to that, attached are a detailed summary of focus group comments and project team responses prepared shortly after the focus group meeting, as well as copies of all written comments received.

Focus Group Meeting to Review the Proposed Study Methodology (August 11, 2003)

A focus group meeting was held on August 11, 2003, to receive input on draft technical memoranda describing the proposed study methodology. About 35 people participated at the CIWMB's invitation, representing a range of stakeholders with interests or concerns over conversion technologies.

In addition, written comments on the proposed study methodology were submitted by:

Charles Wyman, Dartmouth College
David Wood, Grassroots Recycling Council
George Larson, Plastic Energy, LLC
Heidi Melander, Northern California Recycling Association
James A. Hemminger, Rural Counties Environmental Services JPA
John Davis, President, California Resource Recovery Association
John McInnes, County of Santa Barbara, Public Works Department
Kay Martin, County of Ventura, Environmental and Energy Resources
Department
Dr. Michael Fisher, American Plastics Council
Monica Wilson, Global Alliance for Incinerator Alternatives
Paul Relis, CR&R
Paul F. Ryan, P.F. Ryan and Associates, Inc.
Timothy Judge, Masada Oxynol, LLC

¹ This appendix was prepared by Boisson & Associates, responsible for coordinating public input on the study.

² In addition to public input, the CIWMB also contracted with the University of California at Davis to coordinate peer review of both the initial technical memoranda describing the proposed methodology and the draft findings. The peer review is not summarized in this appendix.

Attached to this appendix is a document entitled *Consolidated Focus Group Comments and Responses*. This is a detailed summary of comments received at the August 11 focus group meeting and subsequently in writing, and was prepared in September 2003. It also contains a list of individuals who attended the meeting.

Workshop to Review the Study's Draft, Preliminary Findings (April 15, 2004)

Public input was broadly solicited on draft preliminary findings that were presented during a CIWMB-sponsored workshop in Sacramento on April 15, 2004.³ About 25 people participated in this workshop, representing a range of stakeholders with an interest and/or concerns over the development of conversion technologies in California (a list of attendees is not available).

In addition, written comments on the draft preliminary findings were submitted by:

David Webster, Masada Oxynol

Greg Shipley, Waste to Energy

James L. Stewart, BRI Energy, LLC

Kay Martin, County of Ventura, Environmental and Energy Resources
Department

The following section summarizes the major themes presented in public comments on the preliminary findings.

Major Themes from Public Input on the Preliminary Findings (April 2004)

This summary is intended to capture the major themes expressed in oral and written comments on the study methodology and preliminary findings. It is by no means a comprehensive restatement of every comment received. Only those public comments directly relevant to the study methodology or findings are included in this summary. Major themes in public comments include:

Broad comments on the need for the study

Many expressed appreciation to the CIWMB and its contractor team for the high level of effort and resources being expended on the study. There was apparent consensus that the subject matter of the study is of great concern and is highly relevant to the future of integrated waste management in California.

Many expressed a strong interest in promoting waste management strategies that maximize environmental benefits, while minimizing costs and yielding jobs and other economic benefits. Generally, most appeared supportive of the notion that conversion technologies should have a role in California's future waste management systems. On the other hand, some expressed strong concerns about potential hazardous air emissions and

³ The workshop was preceded on April 14th by a workshop focusing on a separate but related study done by the University of California for the Board called "Performance and Environmental Impact Evaluations of Alternative Waste Conversion Technologies in California."

other environmental concerns, as well as concerns that conversion technology facilities could jeopardize future waste reduction, recycling, product stewardship, and/or zero waste efforts.

Comments on the Study's Scope

Many commentators argued that the study's narrow scope significantly reduces its utility or may lead to inaccurate conclusions. Most with this view suggested the scope should be broadened in various ways, for example by

- Comparing conversion technologies to a broader range of alternatives. Most with this view emphasized that the study should compare conversion technologies to all alternative management strategies that can handle the targeted waste streams (e.g., recycling, composting, incineration, and landfill). Some also suggested comparing conversion technologies to other production facilities that use the same feedstock (e.g., paper recycling manufacturing facilities, plastics recycling facilities);
- Analyzing the full environmental, economic, and societal costs and benefits of conversion technology facilities and alternatives (in addition to the environmental and economic measures included in the study);
- Analyzing the full range of conversion technologies, in addition to the three specific firms and technologies selected as the basis for the study. Some suggested these differences can affect conclusions about environmental and market impacts; and
- Analyzing the potential synergies of combining conversion technology facilities with other waste management facilities to optimize environmental and economic performance. Several commentators argued that the most likely configurations will see conversion technology facilities integrated with other facilities and systems in a way that offers significant economic and environmental advantages to the configuration studied. In particular, several argued that by assuming conversion technology facilities must also develop a new, dedicated MRFs to supply all or a portion of its feedstock needs, the study ignores a range of other potential feedstock sources (e.g., mixed MSW, agricultural waste, and sewage sludge) that may change conclusions about environmental and economic impacts.

Concerns over whether comparisons between CT and alternatives are done fairly.

Some argued the study does not compare conversion technologies with composting in a fair manner. For example, conversion technologies are required in the study to have a dedicated MRF, whereas composting feedstock is delivered by a source-separated supply system. This disregards what some commentators view as a highly probable scenario whereby conversion technology facilities are supplied by a combination of existing MRF residuals, mixed loads of MSW (e.g., from generators known to have a high percentage of organics or other desired feedstock), or sewage sludge from municipal waste water treatment plants. Others were concerned that similar assumptions about location, shipping distances, pollution control equipment, and other factors were not made for all types of facilities analyzed.

Concerns over data quality and verifiability.

Some argued the study's environmental and economic conclusions depend on data about the operational performance of conversion technology facilities that is highly questionable. Some expressed concern that, because the data were supplied by conversion technology developers, they may downplay potential environmental concerns. Others expressed concern that, because the data reflect the maximum allowable air emissions under permit guidelines (in at least one case), the data used may overstate potential environmental concerns.

Some suggested the study's findings regarding potential emission of dioxins and other hazardous pollutants are problematic. Some were concerned that the study did conclude that conversion technology facilities are likely to emit some degree of these hazardous emissions, because no evidence was provided that conversion technology facilities will be able to remove PVC plastic and other sources of chlorine from their feedstock. Others argued that the study should make no mention of these hazardous pollutants at all, because the study acknowledges that insufficient information is available. Additionally, several representatives of particular conversion technology ventures expressed frustration that the study did not accurately represent information about their proposed facilities.

Suggestions on Presenting Findings

During the workshop, several participants strongly suggested that if it is not possible to broaden the scope in the ways described above, the study should be careful not to portray its findings as generally applying to all conversion technologies. Rather, it should present the findings as one particular scenario and take effort to describe the most sensitive variables under which the findings might be different (e.g., type of feedstock, co-location of facilities, type of pollution control equipment, type of technology, tipping fee charged).