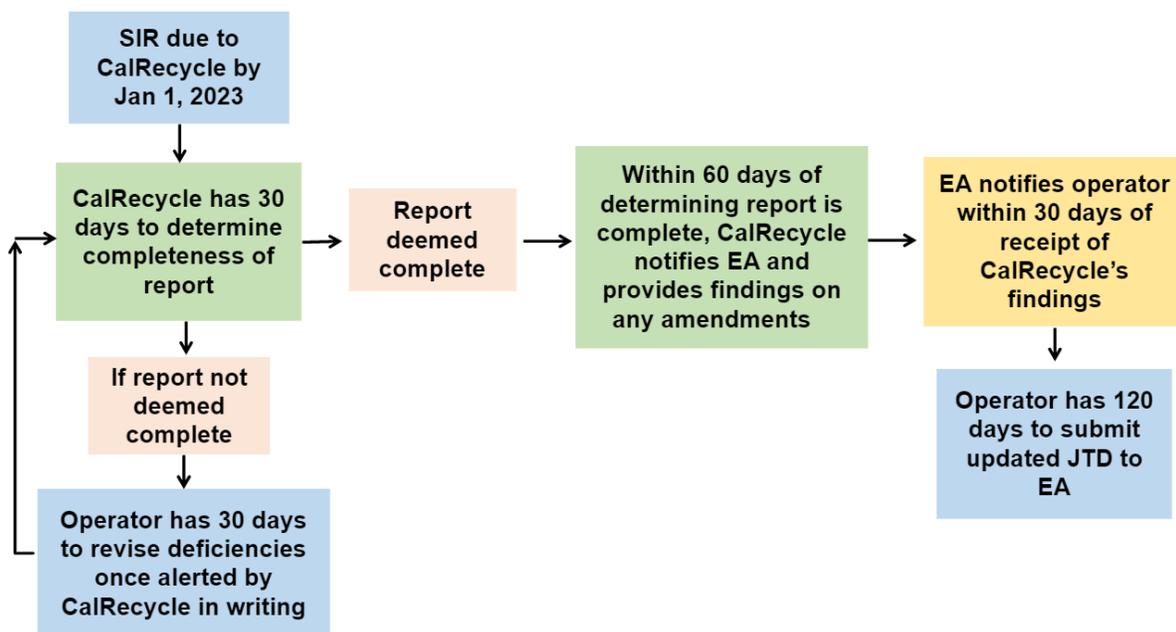


# Landfill Guidance: Organic Disposal Reduction Status Impact Report (Revised November 28, 2022)

## Overview

Operators of solid waste landfills shall submit to CalRecycle an Organic Disposal Reduction Status Impact Report (SIR) in accordance with California Code of Regulations Title 27 Section 21695 that provides an analysis of the potential impacts to the landfill resulting from the implementation of the organic disposal reduction requirements of Public Resources Code Section 42652.5.

The SIR must be prepared by a California licensed civil engineer or licensed engineering geologist. The SIR must be submitted to CalRecycle no later than January 1, 2023 (one year from the effective date of the regulations implementing SB 1383). A detailed description of the timelines for submittal and any subsequent changes that must be made to the Joint Technical Document (JTD) are found in the California Code of Regulations Title 27 Section 21695(d)-(h). The graphic below illustrates key timelines for submittal of the SIR.



A landfill that fails to submit the SIR by the deadline may be subject to enforcement by the local enforcement agency.

Submit the SIR to [permittrainingassistance@calrecycle.ca.gov](mailto:permittrainingassistance@calrecycle.ca.gov) for review. You can also CC' [Janelle.Heinzler@calrecycle.ca.gov](mailto:Janelle.Heinzler@calrecycle.ca.gov).

## What is included in the SIR?

The SIR shall describe the potential impacts, including the expected timing of impacts to the landfill, from the implementation of the organic disposal reduction requirements. The SIR is intended to provide a brief analysis of potential impacts to the landfill operation, landfill gas production, and site life by addressing the items in the regulations as each apply to the landfill. The contents of the SIR submittals are prepared on a case-by-case basis, pertaining to the specifics of each landfill. If there is no change to the items due to the change in organic reductions regulations, then the operator may simply state such in the SIR, with appropriate explanation/justification, as necessary. CalRecycle is not looking for a detailed response at the level of a Joint Technical Document (JTD), but instead provide a brief response as to how the new organic reductions regulations have impacted or are anticipated to impact each of the items listed in Section 21695; in particular, are there are impacts when compared to the latest submitted and/or approved JTD, including the closure and postclosure maintenance plan (CPCMP). While not required by Section 21695, if the landfill for which you are responsible has experienced reductions in organic wastes prior to the issuance of these regulations, please also report that circumstance and how much of an impact those reductions have had on landfill operations and site life as well.

The SIR guidance document's general purpose is as a tool to address each item of Title 27 Section 21695(c)(1) – (c)(13), as indicated by bullet points. The analysis shall include, but not be limited to, impacts to the following thirteen (13) items as listed in Title 27 Section 21695:

**Note: Include cover sheet with Facility Name and SWIS facility number in response.**

1. Site development;

- Indicate any potential impacts to the landfill site, including the timing of the impacts. Include changes due to the reduced organic wastes disposed at the landfill.

2. Waste types/volumes;

- Indicate the estimated volume of organic waste [organic waste includes materials as defined in 14 CCR Section 18982(a)(46)] typically disposed of at the landfill prior to the implementation of the organic disposal reduction requirements; describe the basis of that estimate. Indicate the estimated percentage of organic waste to non-organic waste. Methods may include the following:

1. If the landfill has existing records of specific organic and non-organic waste material types, then the analysis could include the breakdown of types. If not, then a totalized volume of all organic waste and all non-organic waste is sufficient.

2. The SIR could utilize existing records for the landfill or can make assumptions from past studies such as CalRecycle's previous Waste Characterization Studies

(circa 2014, 2018, 2021). Here is a link to the published CalRecycle waste characterization studies: [Waste Characterization Studies Listing](#)

- Indicate any actual and or anticipated reductions in organic waste types/volumes resulting from the implementation of the organic disposal reduction requirements. Include organics reductions experienced prior to January 2020, since January 2020 and anticipated by January 2025.

1. The SIR should take into account all organic waste reduction experienced at the landfill since 2020, including the food wastes required to be reduced since January 1, 2022.

2. Data may be available from the transfer facility operators and/or contributing jurisdictions that deposit wastes at your landfill.

3. Daily and intermediate cover and beneficial use;

(A) For intermediate cover the analysis shall also include:

(1) A description and/or map of the area(s) that have or will have intermediate cover.

- Through the end of 2022

(2). The length of time that the intermediate cover has been used and expected time that it will be used for each defined area.

- Provide a table or description of the timing of intermediate cover per 3(A)(1) above.

(3). A description of how the intermediate cover will be maintained to continue to meet the control criteria of 27 CCR Section 20700(a).

(4). Information on all instantaneous surface readings for methane of 500 ppmv or greater in the area(s) of intermediate cover that has or will be in place for more than 12 months.

i. This information shall be as reflected in the most recent annual report filed pursuant to 17 CCR Section 95470(b)(3).

ii. The location of each such exceedance shall be identified consistent with the monitoring requirements of 17 CCR Section 95469(a)(1)(A).

4. Volumetric capacity based on the disposal site experiencing a reduction of organic waste disposal of 50 percent by 2020 and 75 percent by 2025;

- Indicate impacts, including the expected timing of impacts through the remaining landfill's site life on the landfill's volumetric capacity due to waste reductions experienced and anticipated due to the reduction in organic waste disposal, as

compared to the latest submitted and/or approved JTD/closure and postclosure maintenance plan (CPCMP) for the landfill.

5. Waste handling methods;

- List already implemented or anticipated changes in the landfill's operations/waste handling methods due to the reduction in organic waste disposal.

6. Gas control and monitoring systems;

- Describe any implemented and/or anticipated changes in the landfill gas control and/or monitoring systems due to the reduction in organic waste disposal.

7. Gas generation;

- Calculate any anticipated changes in the landfill gas generation projections, due to the reduction in organic waste disposal, utilizing approved methodologies that meet 17 CCR Section 95460 et seq.

8. Operation and closure design (individual cells and overall site geometry);

- Describe how the reduction in organic waste disposal has or is anticipated to impact the landfill's operational plans described in the last submitted and/or approved closure and postclosure maintenance plans (CPCMP).
- Provide a description of any implemented or anticipated impacts on the landfill's final closure design due to the reduction in organic waste disposal when compared to the last submitted and/or approved CPCMP.

9. Final grading plan;

- Provide a design drawing of the landfill's current permitted final grading plan per the submitted and approved JTD/CPCMP.
- Provide a design drawing(s) or description of any anticipated changes when compared to the last submitted and/or approved JTD/CPCMP due to the reduction in organic waste disposal.

10. Site life estimate;

- Is there an impact to the current closure date when compared to the last submitted and/or approved JTD/CPCMP due to the reduction in organic waste disposal? If so, what is it?

11. Ancillary facilities;

- Describe current or anticipated facilities, in addition to the landfill disposal operations, that may be impacted or have been or will be added due to the reduction in organic waste disposal.

12. Cost estimates for closure and postclosure maintenance;

- Provide a description of anticipated cost estimate impacts to the landfill's latest submitted and/or approved CPCMP due to the reduction in organic waste disposal.
13. Financial assurance mechanisms for closure, postclosure maintenance and non-water corrective action requirements;
- Provide a description of anticipated changes on the landfill's financial assurance mechanisms due to the reduction in organic waste disposal.
14. Although not required by Title 27 Section 21695, please provide your insight on how your responses to Items 1-13 compared to the current landfill permit limitations with respect to impacts due to the reduction in organic waste disposal.

*This guidance tool was developed by CalRecycle as a courtesy for informational and example purposes only. Use of this tool is optional and is not a regulatory requirement. In the event of any conflict with this guidance tool or information herein, applicable statutory and regulatory provisions shall control. This tool and information herein are based on known facts and legal authority as understood by CalRecycle at the time of release. Any analysis, guidance, or other information herein may be subject to change based on changed facts or legal authority, actual or understood, subsequent to the publishing of this tool. The provision of this guidance tool and any analysis, guidance, or other information herein shall not be construed as a waiver of any rights or remedies available to CalRecycle. Users are encouraged to seek the assistance of legal counsel to comply with applicable state law based on their pertinent facts and circumstances.*