

COUNTYWIDE SITING ELEMENT

of the

MONO COUNTY INTEGRATED WASTE MANAGEMENT PLAN

Mono County, California

Recommended for adoption by the
Mono County Solid Waste Task Force

January 2015



Prepared by the
Mono County Department of Public Works
Post Office Box 457
Bridgeport, California 93517
(760) 932-5440

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SECTION 1.0

INTRODUCTION

The following Countywide Siting Element has been prepared by the Mono County Department of Public Works in accordance with requirements established by Title 14, California Code of Regulations (CCR), Division 7, Chapter 9, Article 6.5. In addition to the Source Reduction and Recycling Element (SRRE), the Household Hazardous Waste Element (HHWE), the Non-Disposal Facility Element (NDFE), and the Summary Plan, this document is one of five parts that comprise the Countywide Integrated Waste Management Plan. The purpose of the Countywide Siting Element is to demonstrate that a minimum of 15 years of permitted disposal capacity is available through existing or planned facilities on a countywide or regional basis. To meet this requirement, this document describes the geographic context of the planning area, defines the goals and objectives of this element, provides an estimate of existing countywide disposal capacity, demonstrates that existing capacity exceeds 15 years, and presents general criteria for future siting of new facilities. This document has been developed with review and input from members of the Local Task Force (LTF) including staff from the Town of Mammoth Lakes, the County of Mono, and CalRecycle.

SECTION 2.0

PROGRAM GOALS AND POLICIES

The Mono County Local Solid Waste Task Force (LTF) was originally established by the Mono County Board of Supervisors in January 1990 and ratified by the Town of Mammoth Lakes in April 1990, in accordance with the requirements set forth in section 40950 of the California Public Resources Code. Following a period of inactivity, the LTF was re-organized and re-authorized by the Board of Supervisors in November 1999 and the Town of Mammoth Lakes in December 1999. This group was responsible for developing the 2000 CIWMP which has guided the county's solid waste system until the present time. Membership was modified in May 2004 to replace those who had become inactive, and again in 2006 with the emergence of new stakeholders and staff changes within participating agencies.

By 2012, emerging diversion programs and proposed infrastructure, as well as the upcoming closure of the regional Benton Crossing Landfill, caused a need to formally update the CIWMP to reflect the inevitable transitions of the future planning period. In August 2012, in coordination with existing members, a change in membership as well as new bylaws were recommended and by late 2012 were approved by both the Mono County Board of Supervisors and the Town of Mammoth Lakes. The 2012 bylaws, as well as a list of current members are provided in Appendix A; copies of the local authorizing actions are also included in Appendix A.

The stated duties of the LTF are as follows:

- Advise jurisdictions responsible for the Source Reduction and Recycling Element, Household Hazardous Waste Element and Non-Disposal Facility Element preparation, and review goals, policies, and procedures for jurisdictions, which, upon implementation, will aid in meeting the solid waste management needs of the county, as well as the mandated source reduction and recycling requirements of [Public Resources Code section 41780](#).
- Assist jurisdictions in the implementation of the SRRE, HHWE, and NDFE.
- Provide technical guidance and information regarding source reduction, waste diversion, and recycling to local jurisdictions during preparation and revision of the SRRE, HHWE and NDFE. Such information may be presented to the general public at public hearings and upon request by members of local government and community organizations.
- Identify solid waste management issues of countywide or regional concern.
- Determine the need for solid waste collection and transfer systems, processing facilities,

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- and marketing strategies that can serve more than one local jurisdiction within the region.
- Facilitate the development of multijurisdictional arrangements for the marketing of recyclable materials.
 - To the extent possible, facilitate resolution of conflicts and inconsistencies between or among city and county source reduction and recycling elements.
 - The task force shall develop goals, policies, and procedures which are consistent with guidelines and regulations adopted by CalRecycle, to guide the development of the siting element of the countywide integrated waste management plan.

2.1 Element Goals

In accordance with 14 CCR 18755.1, a set of general goals have been developed by the County and LTF to provide guidance for the countywide solid waste program. The goals defined by the LTF for this Countywide Siting Element are as follows:

- Develop and maintain a long-term waste management infrastructure that serves county residents with an efficient, economic, safe, and convenient system for the collection, processing, disposal and/or export of municipal solid waste generated within county boundaries;
- Implement programs and policies identified in this element as a cooperative effort between the Town of Mammoth Lakes, the County of Mono, private industry, and other regional agencies as appropriate. New source reduction, recycling, composting, and special waste programs shall be coordinated or implemented on a multi-jurisdictional basis to the greatest extent feasible in order to ensure the least cost to ratepayers, to improve the potential for effective programs, and to avoid unnecessary duplication of programs, efforts, and administration.
- Encourage residents, businesses, organizations, and public agencies to maximize source reduction and minimize waste disposal;
- Develop convenient opportunities for residents and businesses to recycle waste materials;
- Encourage residents, businesses, organizations, and public agencies to buy recycled-content products;
- Maintain opportunities for the safe collection, storage, and shipment of household hazardous wastes for proper re-use, recycling, transformation, treatment, or disposal.

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- Educate residents to prevent the inappropriate disposal of household hazardous wastes, motor oil, and other special wastes and;
 - Ensure that long-term disposal capacity is available, whether in-county or outside the county, for waste that cannot be recycled or composted.
 - Utilize Solid Waste Parcel Fees to fund environmentally appropriate closure and post-closure maintenance of existing landfills, and to invest in recycling infrastructure that increases the convenience and benefits of recycling for all county residents.
 - Identify and implement programs that will provide feedstock to locally marketable recyclable products, including transformation and biomass, and assist private sector development of businesses that recycle and re-use these commodities.

2.2 Countywide Policies

The following policies and programs are being implemented by the County in an effort to meet the goals stated above. Some of the policies have been fully implemented and are in a state of maintenance at this time. Other programs are concepts that are anticipated to be developed within the planning period of this document.

Safe Disposal Practices

1. Maintain compliance with state minimum operating standards at all county waste facilities, which includes providing site security and access control, daily compaction and cover of waste, and routine monitoring of landfill gas and ground water at each site.
2. Update the operations plan for each landfill as circumstances change, specifically describing the method of operation, the types of wastes that are accepted and those that are prohibited, the methods to control potential environmental nuisances (e.g., dust, litter, surface drainage), and other elements of site operation as required by Title 27, CCR.
3. Continue to provide County facilities for the safe collection and storage of used motor oil and household hazardous wastes, as well as the proper transformation or disposal of the materials. Maintain a public awareness program to promote the availability of such facilities and the importance of removing these materials from the waste stream.
4. Prepare and implement Final Closure Plans for County landfills as circumstances dictate. Ensure adequate funding for the environmentally appropriate closure and post-closure activities.

Minimize Waste Generation

5. Establish “reuse exchange” areas at county waste facilities for the segregation and storage of re-usable goods. These materials may be set aside by incoming public self-haul customers or salvaged from the waste stream by site personnel prior to disposal.

Conduct and Promote Recycling

6. Continue to provide collection facilities at County landfills and transfer stations that allow the public to deposit recyclable waste material prior to disposal, including scrap metal, white goods, CRTs, e-waste, car batteries, used automotive tires, used motor oil, glass, tin cans, paper, plastics, and cardboard. Wherever feasible, expand these opportunities to include additional materials such as mixed paper.
7. Establish collection receptacles at County parks and well-traveled community areas that enable tourists and the general public to deposit recyclable beverage containers. Provide for the collection and recycling of the materials..
8. Implement the County Mandatory Commercial Recycling Plan. Pursue grant opportunities and provide other assistance to enhance existing commercial recycling efforts. Assist and encourage the establishment of recyclable collection, storage, and processing systems, such as certified redemption centers or certified waste oil collection centers, by community organizations and businesses. Assist their promotion by including information of such programs in public education materials.
9. Develop and distribute information to raise public awareness regarding the availability of recycling facilities countywide and the importance of recycling waste materials. Program implementation should involve schools, public agencies, local businesses, community groups, and the general public.
10. Continue to stockpile and grind wood waste materials at County waste facilities for re-use by the general public, as alternative daily cover, or feedstock for other processes. Provide re-use areas for useable wood waste materials for re-use by the general public, local businesses and public agencies.
11. Continue to utilize equipment and staff to divert clean wood and scrap metal from the waste stream as time and safety permits.
12. Evaluate the potential for set-aside area requirements for recyclable collection and storage facilities in the design of large-scale developments.
13. Implement a diversion program for construction and demolition aggregate material at County Landfills by stockpiling, and crushing the material for beneficial re-use as alternative daily cover, road base, or classified fill.

14. Develop a Master Recycling Plan for all County facilities, and work with team members to achieve the highest diversion rate feasible from all County-owned facilities including offices, parks, campgrounds and community centers.
15. Consider the requirement of curbside recycling service (“Blue Bag” program) throughout Mono County within future franchise contracts, and/or separate Franchise Agreements pertaining to only recyclable materials.
16. Encourage Caltrans and other jurisdictions to develop policies that would require recycled products such as glass cullet, crushed aggregate and asphalt in local road maintenance and development projects.

Conduct and Promote Recycled-Content Purchases

17. Continue to promote the purchase of recycled-content goods by implementing the County Recycled Product Procurement Policy.

Ensure Long-Term Disposal Capacity

18. Develop engineered design plans for Pumice Valley and Walker Landfills that utilizes disposal capacity within the existing waste footprint.
19. As economics or capacity limits dictate, provide for Long Haul Transfer Infrastructure. Such infrastructure can be provided through public funding, private funding, or a public private partnership, which should be selected in an effort to achieve the least cost to ratepayers. Infrastructure should be located as close to population centers as possible without creating significant environmental impacts.
20. Engage in transitional planning to ensure that safe and environmentally appropriate opportunities for the management of sludge are identified prior to such activities being discontinued at Benton Crossing Landfill.

2.3 Implementation Schedule and Administration

All of the policies described in the preceding section have been, or are actively in the process of being, implemented by Mono County in its effort to reduce the quantity of waste disposed in its landfills. Some programs are completed and continuously implemented, others occur on a regularly-scheduled basis, some are currently in development or undergoing revision, and yet others are periodic based on public interest, effectiveness, budget, or staff availability. Landfill permit revisions are anticipated to be completed within the next two years. The status or scheduled frequency of the programs are described in Table 1, below. The policy numbers refer to those described in Section 2.2, above.

TABLE 1					
Projected Program Implementation Schedule					
Policy No.	Status or Frequency	Completion Date	Policy No.	Status or Frequency	Completion Date
1	Continuous	n/a	12	In Progress	GP Update
2	Continuous	n/a	13	Continuous	n/a
3	Continuous	n/a	14	In Progress	Winter 2015
4	Periodic	n/a	15	In Progress	Winter 2016
5	In progress	Summer 2014	16	Continuous	n/a
6	Continuous	n/a	17	Continuous	n/a
7	Continuous	n/a	18	Continuous	n/a
8	Continuous	n/a	19	As Necessary	n/a
9	Continuous	n/a	20	As Necessary	3+ yrs prior
10	Continuous	n/a			
11	Continuous	n/a			

The local agency responsible for administering the program and implementing the above policies established to meet diversion and disposal goals in the unincorporated area is the Mono County Department of Public Works, Solid Waste Division. When requested, the Local Task Force contributes general guidance, assists with policy-making decisions and the local approval process, and provides review of planning documents prior to final approval. The person responsible for managing the program on a day-to-day basis is the Solid Waste Superintendent for Mono County, who can be reached at:

Mono County Department of Public Works
P. O. Box 457 / 74 N. School Street
Bridgeport, California 93517
phone: (760) 932-5453
fax: (760) 932-5441

2.4 Solid Waste Program Funding

The Mono County Board of Supervisors has authorized the establishment of a solid waste enterprise fund through which the countywide program is operated. Revenues generated through parcel fees and gate fees provide the annual operating budget for the program. Additional money for recycling efforts is pursued through grant programs periodically made available by CalRecycle, the California Department of Conservation, or other sources. It is through these mechanisms that the County implements the policies and programs developed to meet the waste reduction, recycling, and disposal goals.

SECTION 3.0

PLANNING CONTEXT

The following section establishes the context of the planning area for the Countywide Siting Element through a brief geographic and demographic overview of Mono County and a status summary of the solid waste management system that has been implemented in the county.

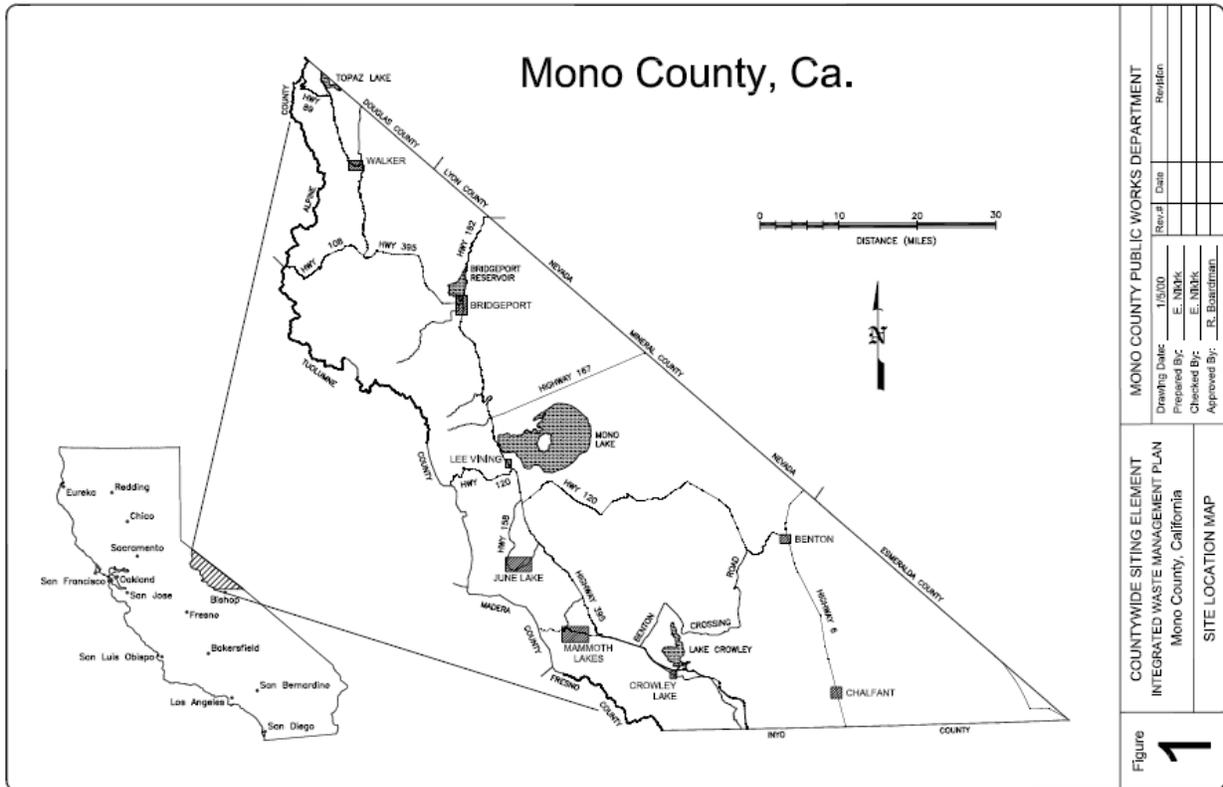
3.1 Geographic Setting

Primarily rural in nature, Mono County is located in central-eastern California, as indicated in Figure 1 on the following page. The county is bordered by the State of Nevada to the north and east, by Inyo County on the south, and by Alpine, Fresno, Madera, and Tuolumne counties on the west. Located in the high desert region on the eastern flank of the Sierra-Nevada Mountain range, Mono County can be geographically characterized as having rugged terrain with steep mountains, narrow valleys, and deserts. In addition, numerous rivers, streams, and lakes are scattered throughout the county. Generally speaking, topographic elevations range from 5,000 feet in the lower valleys and up to 14,000 feet in the White Mountains at the southeastern corner of the county. The county comprises 3,103 square miles of land space, with approximately 2,900 square miles, or 93.4 percent, owned by public entities, which include the federal government (Inyo National Forest, Toiyabe National Forest, Bureau of Land Management), the State of California, local government, and the City of Los Angeles (Department of Water and Power).

3.2 Population

The majority of population centers in the county are found along the Highway 395 corridor, which trends north-south in the western portion of the county. Communities in this area include, from north to south: Topaz, Coleville, Walker, Bridgeport, Mono City, Lee Vining, June Lake, Mammoth Lakes, Crowley Lake, Tom's Place, and Paradise Valley. Additional population areas include the communities of Benton and Chalfant along Highway 6 in the southeast corner of the county. The remainder of the county is largely uninhabited. The 2010 US Census determined the population of Mono County to be 14,202. The California Department of Finance estimates future annual growth at less than 1% per year for the next 50 years (Department, 2013). As of January 1, 2013, the estimate is 14,493 for the entire county. At 4.6 persons per square mile, the resulting population density is one of the lowest in the State.

Figure 1 – Location Map



The Town of Mammoth Lakes is the sole incorporated city established in Mono County. The 2010 Census determined the population of the Town of Mammoth Lakes to comprise 8,234 of Mono County’s 14,202 residents. With approximately 57 percent of the county’s residents, and an even greater percentage of the County’s annual visitor totals, the Town of Mammoth Lakes generates the vast majority of waste within the county.

The population distribution throughout the county is presented in Table 2, below. Locations of the Town of Mammoth Lakes and other communities in the county are presented on the preceding Figure 1, Location Map.

TABLE 2		
Population Centers in Mono County		
Community	Population	Comments
Town of Mammoth Lakes	8,234	Ski area; large 2 nd residence/high tourist influx
<u>Unincorporated Areas</u>		
Antelope Valley	1,265	Coleville, Topaz, & Walker.
Bridgeport Valley	575	Bridgeport & Twin Lakes.
Lee Vining/Mono City	394	n/a
June Lake	629	Ski area; large 2 nd residence
Long Valley/Swall	1,535	Paradise, Sunny Slopes, Swall, Crowley
Tri-Valley	931	Benton, Chalfant, & Hammil Valley.
Total, Unincorporated	5,963	
Total, Countywide	14,202	

(US Census, 2010)

SECTION 4.0

EXISTING SOLID WASTE DISPOSAL CONDITIONS

This section addresses the waste disposal conditions that currently exist within the borders of Mono County. A general description of existing waste facilities and waste haulers is included, as well as specific permit conditions currently in-place at each landfill. The requirements of 14 CCR 18755.5 are addressed by the discussions and data presented in this section.

4.1 Solid Waste and Recycling Services

Two commercial haulers provide residential and commercial waste collection services in Mono County. Mammoth Disposal, a subsidiary of Waste Connections, Inc., is the franchise hauler and service provide for the Town of Mammoth Lakes mandated residential and commercial service.

The unincorporated area of Mono County has two franchisees, including Mammoth Disposal and D&S Waste out of Yerington, NV.

Curbside recycling services are offered throughout the Town of Mammoth Lakes as well as certain parts of the County by Sierra Conservation Project. Other businesses such as Shred-Pro (mixed paper shredding service) and Mammoth Rock-n-Dirt (aggregate crushing) contribute to the available recycling services centering around the Town of Mammoth Lakes.

Self-hauling of waste and recyclable materials is available to all residents of Mono County, with seven Transfer Stations and/or landfills located near population centers. Three of the County's transfer stations now occupy land adjacent to closed landfills that are in a post-closure maintenance period.

Disposal of solid waste in Mono County is conducted at only 3 active landfills. Two of these, Pumice Valley and Walker, currently accept only inert C&D waste for burial, and transfer all municipal solid waste off-site for disposal. The Benton Crossing Landfill has been the County's regional, and sole municipal solid waste landfill, for over 10 years and remains in use today. Figure 2 on the following page presents the locations of each facility.

In accordance with 27 CCR Section 20220, the Benton Crossing Landfill accepts all putrescible and non-putrescible solid and semi-solid waste including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, construction and demolition wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, manure, vegetable or animal solid and semi-solid wastes and other discarded wastes, provided that such wastes do not contain waste which must be managed as a hazardous waste, wastes which contain soluble pollutants in concentrations that exceed applicable water pollution control objectives, or wastes that could cause degradation of waters of the state (designated waste). In addition to typical non-hazardous municipal solid waste as described above, the Benton Crossing Landfill also accepts source-separated waste for management through its waste diversion program, including wood waste, scrap metal, white goods and appliances, waste tires, non-hazardous sewage sludge, CRTs, CEDs, HHW and used oil and filters.

TABLE 3					
Landfill Administration and Permit Information					
Landfill Name	Facility Permit No.	Property Owner	Facility Operator	Operational Status	Permit Date
Benton	26-AA-0006	Mono County	Mono County	Post-Closure	6/17/2013
Benton Crossing	26-AA-0004	LADWP	Mono County	Active	3/8/2013
Bridgeport	26-AA-0002	Mono County	Mono County	Post-Closure	6/17/2013
Chalfant	26-AA-0005	Mono County	Mono County	Post-Closure	6/17/2013
Pumice Valley	26-AA-0003	LADWP	Mono County	Active C&D	7/14/78
Walker	26-AA-0001	Mono County	Mono County	Active C&D	5/22/07

Table 4 below provides a summary of average daily disposal rates and a characterization of wastes that each active landfill is permitted to accept. Daily rates are calculated based on the number of actual operating days.

TABLE 4				
Current Waste Generation and Disposal				
Landfill	Avg. Disposal Rate		Operating	Accepted Waste Types
	(cy/day)	(tons/day)	Days/Yr	
Benton Crossing	204	102	312	MSW (res./comml./indust.) and Inert Construction and Demolition Waste
Pumice Valley	21	13	104	Inert Construction and Demolition Waste
Walker	3	1	104	Inert Construction and Demolition Waste
Totals	228	116		

(SRK 2012, SRK 2013 and SWT 2014)

TABLE 5				
Permitted Maximum Landfill Disposal Rates				
Landfill	Max. Daily Disposal		Max. Annual Disposal	
	(cy/day)	(t/day)	(cy/yr)	(ton/yr)
Benton Crossing	n/a	500	n/a	156,000
Pumice Valley	n/a	n/a	n/a	n/a
Walker	n/a	80	n/a	500
Totals	n/a	n/a	n/a	n/a

Maximum permitted daily and annual disposal rates are specified on SWFPs for Benton Crossing and Walker. Existing SWFP for Pumice Valley (1978) does not establish limits on daily tonnage or capacity.

SECTION 5.0

ESTIMATE OF COUNTY DISPOSAL CAPACITY

Pursuant to the requirements of 14 CCR 18755.3, this section presents information regarding existing disposal capacity available within the county and provides documentation of the disposal capacity that existed in the base year of 1990. In addition, this section presents current estimates of the site life at each landfill and provides a projection of the disposal capacity available for future waste disposal within the county.

This information must be viewed within the context of a system that is in transition. Due to the economic challenges of operating low volume rural landfills, the County is currently in a position where the operation of our landfills exceeds the cost of available long-haul transfer opportunities. This is due to our relatively close proximity to available capacity in other jurisdictions where much larger scale, and more efficient landfill operations are underway.

The County intends on maintaining the current course at Benton Crossing Landfill until a point of closure, but following the closure of this site the County intends to pursue the most cost-effective options to meet future disposal needs. These options include the long-haul transfer of waste. While there is interest in maintaining landfill capacity and the flexibility it affords, by developing long-haul transfer infrastructure the County is assured of another competitive, and capacity-preserving option.

5.1 Base Year Disposal Capacity

As discussed in preceding sections of this report, three active landfills provide disposal capacity for the residents of Mono County. In accordance with the requirements of 14 CCR 18755.3, Table 6, below, has been prepared to present the total permitted and remaining disposal capacities that were in place within the county in 1990.

TABLE 6				
Base Year Disposal Capacity Conditions				
Landfill	Total Permitted Capacity ¹		Total Remaining Capacity ¹ in 1990	
	(cu.yds.)	(tons) ²	(cu.yds.)	(tons) ²
Benton	109,520	27,380	92,920	23,230
Benton Crossing	1,307,990	327,000	822,340	205,585

Bridgeport	767,160	191,790	665,150	166,290
Chalfant	126,380	31,595	97,570	24,390
Pumice Valley	479,940	119,985	376,920	94,230
Walker	247,880	61,970	197,060	49,265
Totals	3,038,870	759,720	2,251,960	562,990

Notes:

- (1) Total permitted capacity is not specified on 1978 permits. Data based on calculations in the site RDSFs (1989) and projected to Jan. 1, 1990 through disposal site survey records.
- (2) Assumed in-place conversion of 500 lb/cy for all sites, given operating practices at that time.

5.2 Current Disposal Capacity

There are existing SWFPs for Benton Crossing Landfill and Walker Landfill. The County is currently in the process of revising the solid waste facilities permit for Pumice Valley Landfill. The Joint Technical Documents (JTD) that have been approved for Benton Crossing and Walker, as well as the JTD developed in draft form for Pumice Valley, define the final disposal capacity and provide estimates of remaining site life.

Future disposal operations at each site will be contained within the existing waste footprint, with disposal capacity provided through vertical fill over existing grades.

Table 7 on the following page presents the remaining disposal capacity and site life estimate for each site under current and proposed permit conditions. It should be noted that capacity data represents the total fill space available, or the aggregate quantities of compacted solid waste and cover soil.

As seen in Table 7, following page, the County currently has approximately 1,164,488 cubic yards of remaining permitted waste disposal capacity. Should permit conditions at Pumice Valley be revised according to proposed site designs, the aggregate disposal capacity will be upgraded to 1,444,777 cubic yards. Under current waste generation and disposal trends (see Table 4) of approximately 66,144 (unadjusted for growth) cy per year, the site life expectancy for all County landfill capacity would be approximately 22 years.

TABLE 7			
Existing and Proposed Disposal Capacity Conditions			
	Current Permit Conditions		Proposed Permit Conditions
Landfill	Remaining Capacity (cy)	Site Life	Remaining Capacity (cy)
Benton Crossing	817,300	until 2023	n/a
Pumice Valley	232,851	n/a	513,140
Walker	114,337	+100 yrs	n/a
Totals	1,164,488		513,140

(SRK 2012, Mono County 2014, SRK 2013, SWT 2014) Note: Site life expectancies are based on existing volume and capacities on a site-by-site basis.

5.3 Projected Waste Disposal Requirements

State solid waste regulations require that the Countywide Siting Element develop a projection of waste disposal quantities and the resulting impact on remaining countywide landfill capacity over a 15-year period. Table 8 on the following page presents an annual volumetric accounting of the estimated disposal quantities over the next 15 years. The annual reduction in disposal capacity of existing facilities is calculated for the period under consideration, assuming that current permit conditions remain the same.

As one would expect after reviewing the site life projections addressed in the preceding section, Table 8 demonstrates that Mono County has sufficient capacity through existing disposal facilities to handle the quantity of waste expected to be collected over the next 15 years, whether current or proposed permit conditions apply.

Given current permit conditions, it is anticipated that Mono County will retain an estimated 548,515 cubic yards (589,850 tons) of waste disposal capacity 15 years from the date of this report preparation. Although weight-based data for remaining capacities is not presented in Table 8, this information may be viewed on the detailed spreadsheet enclosed in Appendix D. Table 8 does not account for waste exported out of the county since this amount, should it exist, accounts for a minute portion of the total county-wide waste stream. Additionally, very limited waste is imported into Mono County (from campgrounds in Madera County) for disposal at its landfills, so this was not addressed either.

<p align="center">TABLE 8</p> <p align="center">15-Year Countywide Disposal Capacity Projections</p>								
Calendar Year	No. of Years	In-Place Disposal ¹		Cover Soil Required ²		Total Annual Fill		Remaining Capacity ²
		(tons/yr)	(cy/yr)	(tons/yr)	(cy/yr)	(tons/yr)	(cy/yr)	(cu.yds.)
2014	1	33,280	66,144	13,312	26,458	46,592	92,602	1,164,488
2015	2	33,446	66,475	13,379	26,590	46,825	93,065	1,071,423
2016	3	33,614	66,807	13,445	26,723	47,059	93,530	977,893
2017	4	33,782	67,141	13,513	26,856	47,294	93,998	883,896
2018	5	33,951	67,477	13,580	26,991	47,531	94,468	789,428
2019	6	34,120	67,814	13,648	27,126	47,769	94,940	694,488
2020	7	34,291	68,153	13,716	27,261	48,007	95,415	599,074
2021	8	34,462	68,494	13,785	27,398	48,247	95,892	503,182
2022	9	34,635	68,837	13,854	27,535	48,489	96,371	406,811
2023	10	34,808	69,181	13,923	27,672	48,731	96,853	309,958
2024	11	34,982	69,527	13,993	27,811	48,975	97,337	212,621
2025	12	35,157	69,874	14,063	27,950	49,220	97,824	114,797
2026	13	35,333	70,224	14,133	28,089	49,466	98,313	16,484
2027	14	35,509	70,575	14,204	28,230	49,713	98,805	-82,321
2028	15	35,687	70,928	14,275	28,371	49,962	99,299	-181,620

1. In Place Disposal includes an increase of .5% per year.

2. Cover Soil Requirements based on average of 2.5:1 waste-soil ratio

SECTION 6.0

IDENTIFICATION OF ADDITIONAL DISPOSAL CAPACITY

Mono County does not currently have plans to establish any new solid waste disposal sites within its jurisdictional boundaries. Based on the data presented in this report, the County will not exhaust its remaining permitted disposal capacity for over 13 years. With proposed disposal capacity included, this period grows to over 17 years. At this time, the County does not intend to site any additional disposal sites, but instead will look to other methods to extend our existing capacity, and if necessary and desirable, to export waste. Identification of any new disposal facilities in the future will require an amendment of this document and the approval of local governing bodies.

As stated in previous sections of this report, the County is nearing closure of its regional landfill at Benton Crossing. As a result, there is considerable interest and effort being applied to identifying future plans. First and foremost are efforts to reduce our waste stream through increased diversion and recycling. It is expected that these efforts will yield annual decreases in total waste generation, instead of the increasing figures shown in Table 8. Should these efforts prove successful, the County's existing permitted capacity would be extended beyond 15 years.

Although capacity remains at other County landfills, re-starting a municipal solid waste landfill at either of these sites does not appear to be the preferred economic or environmental solution at this time. As a result, the development of long-haul transfer infrastructure is being contemplated. This approach would ensure the County's ability to dispose of its waste without needing additional disposal capacity within the County. The County would seek to utilize this option so long as it proves to be the most economical choice, and would maintain local capacity for emergency circumstances and as an alternative should the economics of long-haul eventually deteriorate.

In accordance with the requirements set forth in 14 CCR 18756, the County has established a set of criteria for the future expansion of existing landfills or the siting of new disposal facilities. This criteria is divided into four major categories, as specified in 14 CCR 18756. The general criteria for each category is described below. Should the County pursue location of a new facility in the future, a detailed set of criteria with exclusionary and ranking considerations may be prepared by County staff and members of the Local Task Force.

Environmental Considerations

- Future disposal sites shall be located on parcels that are located no closer than 1,000 feet from any of the following: 1) residences; 2) major highways; and, 3) perennial bodies of surface water.

In addition, the static ground water level from the uppermost aquifer shall be no closer than 25 feet from the base of the planned disposal unit.

- Potential disposal sites shall not pose significant impacts to any special status species. Sites with limited habitat value (disturbed sites, reclamation sites) shall be preferred over sites with native habitat values. Future landfills or lateral expansions of existing sites shall be located no closer than (FAA Rules?) 5 miles from the end of any airport runway used by a turbojet aircraft, nor closer than 5,000 feet from the end of any airport runway used only by piston-type aircraft.
- No future site or lateral expansions of existing sites shall be placed in any of the following settings: 1) a 100-year floodplain; 2) wetlands; 3) within 200 feet of a fault that has experienced displacement in Holocene time; 4) any site that has unstable soils or soils susceptible to liquefaction; and, 5) ground water recharge zones.
- Future landfills or lateral expansions of existing sites with workable soil on-site in a quantity sufficient to meet the daily cover needs of the planned disposal unit, and sites with native low-permeable soil that is suitable for use in final cover construction will be ranked higher than those without.
- In an effort to reduce vehicle miles traveled and related GHG emissions, potential disposal sites shall be as close as possible (notwithstanding the above direction) to waste-generating sources.
- Future disposal sites shall be located in such a way that no operations are visible (within one mile) from any state highway, scenic vista or tourist destination.

Environmental Impacts

- An environmental review process will be initiated for evaluation of any parcel selected to receive a future disposal facility, in compliance with the requirements set forth by the California Environmental Quality Act (CEQA). Mitigating measures shall be implemented in the event that significant environmental impact is established. Sites with little or no mitigation requirements will be ranked higher than those with substantial measures.
- Any location selected in the future for establishment of a transformation facility (i.e., compost, bio-digestion, thermal biomass, waste-to-energy) shall be evaluated with respect to potential air quality impacts. Potential locations shall minimize exposure to any adverse air quality impacts.
- Any location selected to receive a future disposal facility shall take into consideration the potential impact on surrounding parcels as a result of site development, including the following: 1) storm water surface flows and channel discharge; 2) ground water; 3) soil erosion and sediment transport; 4) slope stability; 5) litter; 6) traffic; 7) noise; 8) visibility; and, 9) dust. Impact may require that mitigating measures be established.

Socio-Economic Considerations

- Any site under consideration for a future landfill shall be sufficient in size to ensure that it will provide a minimum of 15 years of disposal capacity for the proposed service area.
- Sites under consideration for a future disposal site shall be located as close as possible to the community(ies) it will serve.
- Sites under consideration for a future disposal site shall be located where the zoning designation of adjacent parcels is compatible with the intended use of the site.
- Sites under consideration for a future disposal site shall either be accessible by existing roads, or be located within a reasonable distance from existing roads such that development costs will not be excessive.
- Location of a future disposal facility shall be consistent with the County General Plan and other local planning considerations.

Legal Considerations

- Future disposal facilities shall be developed and operated in compliance with all applicable local, state, and federal solid waste regulations.

In the event that it becomes necessary for Mono County to establish a new disposal facility in the future, the Local Task Force will develop a detailed siting process. The process will be defined by a series of sequential steps that will gradually expand in detail and narrow in focus. The purpose of the effort will be to meet the needs of the community and goals of the County, as described in Section 2.0 of this report. The siting criteria summarized above will be expanded upon and a ranking hierarchy will be established. The geographic search for appropriate sites and the subsequent screening process will be managed by County personnel, with direction from the Mono County Board of Supervisors, and guidance from the Local Task Force. Community workshops will be held at appropriate intervals in the process to educate the public and allow feedback to County managers. Once the selection process has narrowed its focus and a preferred site has been identified, a detailed site investigation will take place.

SECTION 7.0

GENERAL PLAN CONSISTENCY

All active landfill sites have a land use designation of Public Facilities in the Mono County General Plan. This land use designation permits Solid Waste infrastructure and Landfills subject to Use Permit. A copy of a letter from the Mono County Planning Department certifying that all existing County landfill sites are consistent with the Mono County General Plan is provided in Appendix E of this report.

SECTION 8.0

LOCAL AGENCY APPROVAL

The 2015 update of the CSE began in the Summer of 2013, at the July meeting of the SWTF, where Goals and Objectives of the plan were presented and discussed. Comments and suggestions from that effort were incorporated into a Draft CSE, which was brought back to the SWTF for additional comments and feedback. A final draft was presented to the group in September 2014, and was recommended to the Mono County Board of Supervisors on November 6, 2014.

SECTION 9.0

REFERENCES

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Vector Engineering, 1992, *Source Reduction and Recycling Element for Mono County, California*: unpublished report prepared for the Mono County Department of Public Works, Vector Engineering, Inc., Carson City, Nevada, July 1992.

APPENDIX A

Solid Waste Task Force Appointees

(as approved by the Mono County Board of Supervisors May 19, 2015 and the Town of Mammoth Lakes Town Council May 20, 2015)

Solid Waste Representative from Mono County

Tony Dublino, Solid Waste Superintendent

Public Works/Solid Waste Representative from the Town of Mammoth Lakes

Grady Dutton, Public Works Director

Representative from D&S Waste Removal, Inc.

Kevin Brown

Representative from Mammoth Disposal, Inc.

Rick Vahl

Representative from Sierra Conservation Project

Brian Robinette

Representative from Mammoth Mountain Ski Area

Steve McCabe

Representative from Mammoth Community Water District

Karl Schnadt

Public-At-Large

Delinda Briggs

Representative from the Construction Industry

Dawn Vereuck

Representative from the Lodging Industry

Vacant

Public at Large

Vacant

LEA Program Manager/Mono County Health Department (non-voting member)

Jill Kearney

Mono County Solid Waste Task Force Bylaws

(as approved by the Mono County Board of Supervisors May 19, 2015 and the Town of Mammoth Lakes Town Council May 20, 2015)

ARTICLE I

Legal Authority and History

The Mono County Solid Waste Task Force (SWTF) shall be the Local Task Force as required by California Public Resources Code Section 40950. A seven member solid waste task force was originally established by the Mono County Board of Supervisors in January, 1990 and confirmed by the Town of Mammoth Lakes in April, 1990. In November 1999, the Mono County Board of Supervisors established an eight member solid waste task force, with subsequent ratification by the Town Council. Membership has been modified several times since then to reflect emerging stakeholders and personnel changes.

ARTICLE II

Purpose

The purpose of the SWTF is to allow various government agencies, solid waste haulers, and other stakeholders to discuss issues and topics of mutual interest. To the extent that a consensus can be reached among the membership, the SWTF may offer suggestions to the Board and Council on matters relating to municipal solid waste and hazardous waste management, operation and maintenance of the landfills and transfer stations within the County and the Town, and other facilities related to the County and the Town's solid waste disposal system.

ARTICLE III

Duties

The SWTF shall meet at least bi-annually to discuss and make recommendations to the Board and Council regarding management of the County and Town's solid waste disposal systems. These recommendations and other duties shall consist solely of and pertain solely to:

1. Advise jurisdictions responsible for the Source Reduction and Recycling Element, Household Hazardous Waste Element and Non-Disposal Facility Element preparation, and review goals, policies, and procedures for jurisdictions, which, upon implementation, will aid in meeting the solid waste management needs of the county, as well as the mandated source reduction and recycling requirements of [Public Resources Code section 41780](#).
2. Assist jurisdictions in the implementation of the SRRE, HHWE, and NDFE.

APPENDIX A

3. Provide technical guidance and information regarding source reduction, waste diversion, and recycling to local jurisdictions during preparation and revision of the SRRE, HHWE and NDFE. Such information may be presented to the general public at public hearings and upon request by members of local government and community organizations.
4. Identify solid waste management issues of countywide or regional concern.
5. Determine the need for solid waste collection and transfer systems, processing facilities, and marketing strategies that can serve more than one local jurisdiction within the region.
6. Facilitate the development of multijurisdictional arrangements for the marketing of recyclable materials.
7. To the extent possible, facilitate resolution of conflicts and inconsistencies between or among city and county source reduction and recycling elements.
8. The task force shall develop goals, policies, and procedures which are consistent with guidelines and regulations adopted by CalRecycle, to guide the development of the siting element of the countywide integrated waste management plan.

ARTICLE IV

Composition and Voting

Section I—Membership

The SWTF shall be composed of nine voting members and three non-voting members, according to the following affiliations:

Voting Members:

1. Solid Waste Superintendent for Mono County
2. Town Manager or Appointee from the Town of Mammoth Lakes
3. Representative from Sierra Conservation Project
4. Representative from Mammoth Mountain Ski Area
5. Representative from Mammoth Community Water District
6. Public-At-Large
7. Representative from the Construction Industry
8. Representative from the Lodging Industry
9. Public at Large

APPENDIX A

Non-Voting Member:

1. Representative from D&S Waste Removal, Inc.
2. Representative from Mammoth Disposal, Inc.
3. LEA Program Manager/Mono County Health Department

Section II—Terms of Office

Voting members 1-5 and Non-Voting Members 1-3 shall enjoy perpetual membership to the SWTF. The appointed representatives shall be controlled by the individual organizations they represent, and may change from time to time.

Voting members 6-9 have two-year terms, which can be renewed without limit. These members shall be recruited and recommended by the current SWTF, and shall be formally appointed by both the Board and the Council. Members 8-11 shall not be employed by, or be elected or appointed officials of the Town of Mammoth Lakes or the County of Mono. No appointment of any member in these categories shall be made without the consent and concurrence of both the Board and the Council.

Section III—Voting Privileges

Each voting member of the SWTF shall be entitled to one vote on all issues presented at regular and special meetings at which the member is present.

Section IV—Committees of the SWTF

The SWTF may establish such ad hoc, standing, or technical advisory committees as needed to carry out the purpose of the SWTF, and to provide input on solid waste management issues from various areas of expertise.

ARTICLE V

Meetings

Section I—Time of Meetings

The SWTF shall meet regularly, at least bi-annually, at a time and place to be fixed by the SWTF, and shall hold special meetings which, from time to time, shall be called by the Chair. Meetings shall be open to the public. Meetings shall be held in accordance with the Ralph M. Brown Act, Government Code Section 54950 et seq. (Brown Act).

Section II—Conduct of Meetings

APPENDIX A

A. Five members constitute a quorum for the transaction of business at any meeting of the SWTF. If fewer than five members are present at a meeting, those members present may adjourn the meeting from time-to-time without further notice.

B. In the event that the SWTF convenes a meeting with at least five and no more than seven members, the act of four affirmative votes shall be the act of the SWTF. In the event the SWTF convenes a meeting with 8 or more members, the act of a majority of voting members present shall be the act of the SWTF

ARTICLE VI

Officers and Duties

Section I—Officers

The officers of the SWTF shall be the Chair, the Vice-Chair and the Clerk.

Section II—Appointment of Officers

The Chair shall be the Solid Waste Superintendent of Mono County. The Vice-Chair shall be the Representative from the Town of Mammoth Lakes. The Clerk shall be appointed by the Chair, accepted by the appointee, at the beginning of each meeting of the SWTF. The Chair or Vice-Chair may serve as the Clerk as necessary.

Section III—Duties

- A. The Chair shall preside at all meetings and is entitled to vote on all issues.
- B. The Vice-Chair shall preside in the absence of the Chair.
- C. In the event the Chair and Vice-Chair are both absent at a meeting for which a quorum is present; those members in attendance shall elect an ad hoc Chair for that meeting.
- D. The Chair calls regular meetings of the SWTF, prepares and distributes the agenda, and may call special meetings of the SWTF and may establish ad hoc committees as needed from time to time.
- E. The Clerk shall keep minutes of the SWTF meetings, which are provided to and distributed by the Chair.

ARTICLE VII

Removal and Addition of Members

All members shall serve at the pleasure of their appointing authorities and such authorities may remove or replace their appointee at any time. Any vacant position shall be filled in the same manner as the original appointment.

Any member who fails to attend three consecutive regular meetings of the SWTF without previous notice or excuse shall automatically vacate his or her position.

ARTICLE IX

Amendments to the Bylaws

APPENDIX A

These Bylaws may be added to, amended, or repealed. Adoption of new or amended Bylaws, or repeal of Bylaws, shall be recommended to the Board of Supervisors and Town Council by a majority vote of the members of the SWTF at any regular or special meeting called for that purpose, at which a quorum is present. All amendments to the Bylaws, after approval by the SWTF, shall be effective only upon approval of the Board and Council.



**MONO COUNTY
DEPARTMENT OF PUBLIC WORKS
SOLID WASTE DIVISION**

POST OFFICE BOX 457 • 74 NORTH SCHOOL STREET • BRIDGEPORT, CALIFORNIA 93517
760.932.5440 • FAX 760.932.5441 • monopw@mono.ca.gov • www.monocounty.ca.gov

Mono County Solid Waste Task Force

**Meeting of November 6, 2014
1:00-3:00 p.m.
Board of Supervisors Meeting Room
Sierra Center Mall, Mammoth Lakes**

MINUTES

1. Call to order.

In attendance:

Jeff Walters

Karl Schnadt

Brian Robinette

Grady Dutton

Tony Dublino

Jill Kearney

Kevin Brown

Steve McCabe

2. Public Comment on items not on the agenda.

TOML is going to bring new update to code re: recycling

3. Approval of Minutes from September 4, 2014 meeting.

Moved Schnadt second robinette unanimous pass

4. Consider Draft Update to the HHW Element of the Countywide Integrated Waste Management Plan. Provide input and direction as necessary.

Schnadt: no problems

Should we consider including procedure for mgmt. of biohazardous (ebola) waste? Is this the appropriate place for such a situation, or should it be in an ERP?

Document will be reviewed and brought back to group.

APPENDIX C

[Addressee, Firm]
[Subject]

[Date]
Page 2 of 2

5. Consider and potentially recommend 2014 Update to the Countywide Integrated Management Plan (including the Countywide Siting Element, Non-Disposal Facility Element and Household Hazardous Waste Element) to the Mono County Board of Supervisors.

Motion Brown, steve mccabe second. Unanimous approval of the Countywide siting element and the NDFE but NOT the HHWE

6. Discussion of next steps to bring the SWTF Bylaws, as well as the SWTF-recommended Plan before the Mono County Board of Supervisors and the Town of Mammoth Lakes Town Council, as necessary.

Dublino will coordinate with Dutton to get on Town Council Agenda

7. Consider cancellation of certain 2015 meetings (Currently Thursdays February 5, May 7, August 6, and November 5).

Will amend bylaws to reflect changes in the meeting schedule to twice a year.

8. Adjourn to Next meeting as determined by group.

NON-DISPOSAL FACILITY ELEMENT

of the

MONO COUNTY INTEGRATED WASTE MANAGEMENT PLAN

Mono County, California

Recommended for Adoption by the
Mono County Solid Waste Task Force

January 2015



Prepared by the
Mono County Department of Public Works
Post Office Box 457
Bridgeport, California 93517
(760) 932-5453

1.0 INTRODUCTION

The County of Mono is pleased to present this updated Non-Disposal Facility Element (NDFE) to CalRecycle per CCR, Title 14, and guidelines pursuant to AB341. This document outlines the County's geographic area, provides relevant information on the County's solid waste disposal infrastructure on non-disposal facilities. The document includes descriptions of non-disposal facilities that are considered part of the regional system, though are not within the jurisdiction of Mono County. The document includes a brief description of proposed non-disposal facilities that have been discussed in recent years as the region anticipates transition from the current system to one based upon diversion and long haul transfer. The NDFE presented herewith is incorporated into and made a part of the Mono County Integrated Waste Management Plan.

2.0 REGIONAL DESCRIPTION

2.1 Geographic Setting

Primarily rural in nature, Mono County is located in central-eastern California. The county is bordered by the State of Nevada to the north and east, by Inyo County on the south, and by Alpine, Fresno, Madera, and Tuolumne counties on the west. Located in the high desert region on the eastern flank of the Sierra-Nevada Mountain range, Mono County can be geographically characterized as having rugged terrain with steep mountains, narrow valleys, and deserts. In addition, numerous rivers, streams, and lakes are scattered throughout the county. Generally speaking, topographic elevations range from 5,000 feet in the lower valleys and up to 14,000 feet in the White Mountains at the southeastern corner of the county. The county comprises 3,103 square miles of land space, with approximately 2,900 square miles, or 93.4 percent, owned by public entities, which include the federal government (Inyo National Forest, Toiyabe National Forest, Bureau of Land Management), the State of California, local government, and the City of Los Angeles (Department of Water and Power).

2.2 Population

The majority of population centers in the county are found along the Highway 395 corridor, which trends north-south in the western portion of the county. Communities in this area include, from north to south: Topaz, Coleville, Walker, Bridgeport, Mono City, Lee Vining, June Lake, Mammoth Lakes, Crowley Lake, Tom's Place, and Paradise Valley. Additional population areas include the communities of Benton and Chalfant along Highway 6 in the southeast corner of the county. The remainder of the county is largely uninhabited.

The 2010 US Census determined the population of Mono County to be 14,202. Approximately 60% of those residents reside within the Town of Mammoth Lakes, which is not a part of the County's jurisdiction. The Town also experiences significant transient occupancy, which stretches the occupancy of the Town to well over 30,000 people at one time.

The California Department of Finance estimates future annual growth at less than 1% per year for the next 50 years¹. As of January 1, 2013, the estimate is 14,493 for the entire county. At 4.6 persons per square mile, the resulting population density is one of the lowest in the State.

3.0 SOLID WASTE SERVICES

Two commercial haulers provide residential and commercial waste collection services in Mono County. Mammoth Disposal, a subsidiary of Waste Connections, Inc., is the franchise hauler and service provider for the Town of Mammoth Lakes mandated residential and commercial service. The unincorporated area of Mono County has two franchisees, including Mammoth Disposal and D&S Waste out of Yerington, NV.

Curbside recycling services are offered throughout the Town of Mammoth Lakes as well as certain parts of the County by Sierra Conservation Project. Other businesses such as Shred-Pro (mixed paper shredding service) and Mammoth Rock-n-Dirt (aggregate crushing) contribute to the available recycling services centering around the Town of Mammoth Lakes.

Self-hauling of waste and recyclable materials is available to all residents of Mono County, with eight Transfer Stations and landfills located near population centers.

3.1 DISPOSAL FACILITIES

Disposal of solid waste in Mono County is conducted at 3 active landfills. Two of these, Pumice Valley and Walker, currently accept only inert C&D waste for burial, and transfer all municipal solid waste off-site for disposal. The Benton Crossing Landfill has been the County's regional, and sole municipal solid waste landfill for over 10 years, and remains in use today.

In addition to being the regional landfill, Benton Crossing Landfill also performs vital non-disposal functions as part of normal operations. This includes the processing and diversion of clean wood waste, as well as the processing and sorting of certain C&D waste. These efforts include the periodic crushing of C&D aggregate material as well as the sorting of mixed C&D to reduce the amount of metal and clean wood within the mixed loads. The landfill also provides sludge management and diversion services for biosolid waste originating primarily in the Town of Mammoth Lakes, through the Mammoth Community Water District.

3.2 NON-DISPOSAL FACILITIES

3.2.1 Transfer Stations

Mono County maintains 6 low volume Transfer Stations in various communities throughout the county. The Transfer Stations are operated under contract (currently by D&S Waste of Yerington, NV). These facilities accept municipal solid waste for transfer to a disposal site, as well as accept materials for recycling, including glass, aluminum, plastic, HHW, metal and wood waste. The percentage of diverted waste received at the Transfer Stations averages approximately 30%. Additional details on diversion rates by site can be found in Appendix A below.

From Transfer Stations south of Conway Summit (Pumice Valley, Chalfant, Benton, Paradise), waste is currently transported to Benton Crossing Landfill for disposal. From sites north of Conway Summit (Bridgeport, Walker) waste is currently transported to Lockwood regional landfill in Sparks, NV, via the D&S Waste Transfer Station in Yerington.

At all facilities except Paradise, wood waste is processed on site by County personnel, and beneficially re-used for ADC or post-closure maintenance. Chipped wood waste is also offered to the general public for use in landscaping applications.

Recyclable material from the transfer stations is transported to a variety of other facilities for future processing. In some cases, materials are consolidated at Benton Crossing Landfill where they await on-site processing and/or pickup (metal, HHW). Aluminum, glass and plastic are hauled to other recycling centers where they are processed and eventually transported to market.

Outside of the County's jurisdiction but playing a significant role in the overall system is the Transfer Station and Recycling Center located in the Town of Mammoth Lakes. This facility is owned and operated by Mammoth Disposal, and currently accepts municipal solid waste for transfer to Benton Crossing Landfill, as well as HHW, metal, and other recyclable materials for transport to market.

3.2.2 CRV Buyback Centers

There are two CRV buyback centers located in the County. One is located at the Walker Senior Center in the north end of the County, and the Mammoth Lakes Recycling Center mentioned above.

3.2.3 Proposed Non-Disposal Facilities

As the County and the Town of Mammoth Lakes move toward increased diversion goals and the closure of the regional landfill approaches, planning for Non-Disposal Facilities has been steadily increasing.

The Town of Mammoth Lakes, in partnership with Mammoth Disposal, has planned for the expansion of the Transfer Station that may include a long haul transfer station, a MRF, and a permanent HHW facility.

D&S Waste has proposed a Non-Disposal facility in the Mono Basin that may include long-haul transfer capability for County waste, as well as necessary recycling capabilities.

There are many other concepts being explored at this time, including a small scale sorting and baling facility located on County land to be run by inmate labor. Another concept is the development of a Regional Recycling Center at the Pumice Valley Landfill. Yet another is the siting of a similar facility within close proximity to the Town of Mammoth Lakes, through a federal land exchange.

Additionally, alternative technologies are emerging such as composting, transformation technology, thermal biomass and others that, if developed, would require non-disposal facilities capable of providing feedstock to their operations. The possibility for this future need is an important factor when considering potential siting and capacities for non-disposal facilities in the region.

One or more of these proposals may come to fruition in the coming years. The County is committed to working with stakeholders to determine the most cost-effective waste management solutions.

3.2.4 Siting Criteria for Future Non-Disposal Facilities

Although numerous concepts for future facilities have been discussed, the development of any of those facilities is not certain at this time. Nonetheless, members of the Solid Waste Task Force agreed

that siting criteria for such facilities would benefit the future planning of the facilities, and have developed the following criteria:

Proximity to waste generating sources

NDFE1: To the extent feasible and necessary, facilities should have proximity to power, water, and sewer services.

NDFE2: Facilities should be located as close as possible to communities, and should not exceed normal commute distances for a given community.

Minimum separation from incompatible land uses

NDFE3: Existing land use regulations (zoning code, land use designations) should determine whether adequate separation exists.

NDFE4: Character of areas should be considered when siting facilities.

NDFE5: Adequate distance from sensitive receptors should be maintained in order to comply with existing regulations.

NDFE6: Facility siting should be driven by public process, with public hearings part of the process.

Lands status

NDFE7: Facilities should utilize pre-disturbed lands.

NDFE8: Ownership of land can be public or private, so long as long-term use and future availability are ensured.

Facility/Operations:

NDFE9: Specific needs should be identified first, and facilities should be designed to meet those needs.

NDFE10: The cost effectiveness of a project is determined by the construction and operational cost of providing services to meet the identified needs.

Competitive bidding

NDFE11: Competitive bidding is critical to saving the taxpayers money.

NDFE12: Unless competitive bidding would infringe on existing franchise agreements, it should be utilized for construction and operations of facilities.

NDFE13: Competitive bidding must incorporate policy goals of a given jurisdiction, which may or may not be specific to Solid Waste. These policy goals may affect the cost effectiveness of proposals.

NDFE14: Requests for Proposals should be based on meeting identified needs, and to the extent possible should not impose specific practices and methods. This allows respondents to design effective solutions based on their own methods and expertise.

Regional Needs

NDFE15: Regional need, and regional coordination (with Inyo County) should be an integral part of facility planning.

Nuisance controls

NDFE16: Potential nuisance issues should be identified and mitigated through the CEQA process.

NDFE17: Whenever possible, nuisance controls should be engineered and designed into projects. Should nuisance problems arise, they should be addressed iteratively.

Diversification/Transformation minimums

NDFE18: Future facilities should be designed to meet minimum diversion requirements, articulated by percentages of diversion and not total tonnage.

NDFE19: Diversion requirements should be developed for each waste stream where there is a diversion need.

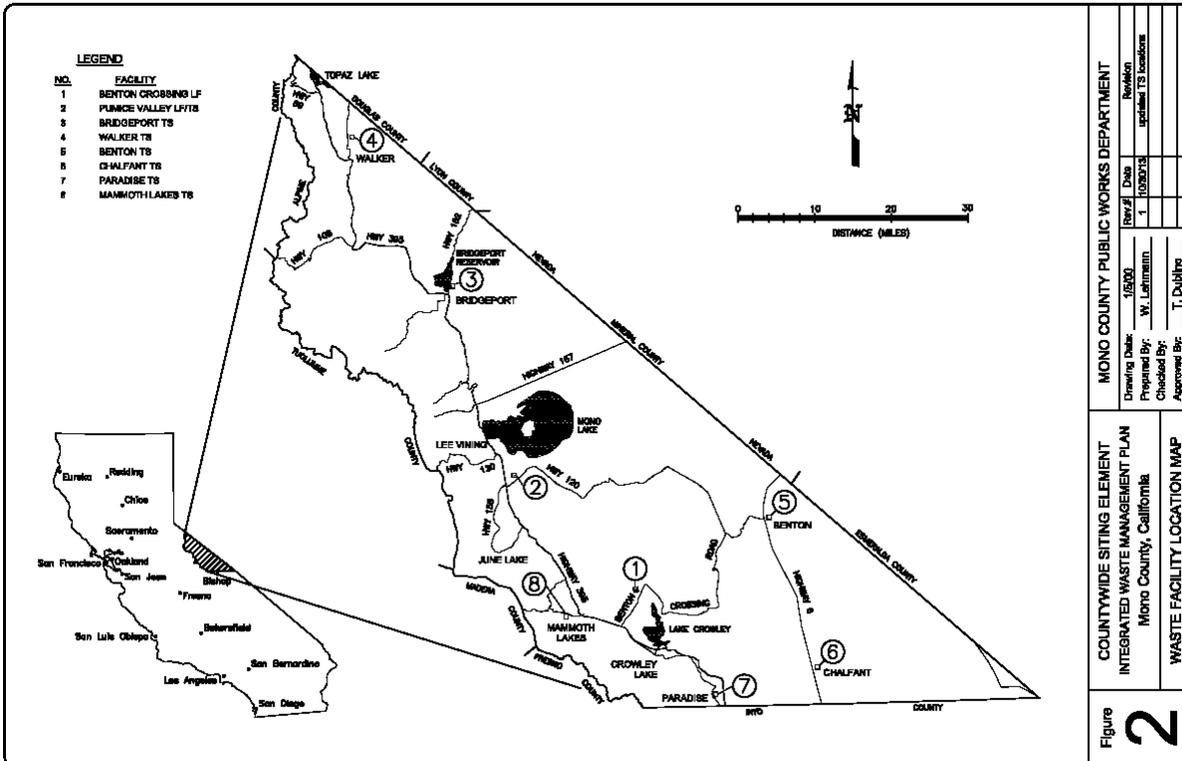
NDFE20: Provisions must be in place to allow for the amendment of diversion minimums to respond to changes in markets, regulatory mandates or other issues.

NDFE21: Amendments to diversion minimums should trigger commensurate changes in compensation to operators.

Anticipating the future

NDFE22: RFPs should require projects to be able to meet today's needs, as well as accommodate future technology such as waste-to-energy, anaerobic digestion or biomass.

Exhibit 1—Existing Waste Facilities within Mono County



Appendix A-Facility Descriptionsⁱⁱ

Nondisposal Facilities Within Mono County (at least 5% recovery of total volume)

Name of Facility: Benton Crossing Landfill (SWIS 26-AA-0004)

Type of facility: Solid Waste Disposal Site

Facility Capacity: 500 tons per day

Anticipated Diversion Rate : 25%

Participating Jurisdictions: Mono County, Town of Mammoth Lakes

Location of Facility: 899 Pit Road, Crowley Lake, CA 93546

Name of Facility: Benton Transfer Station (SWIS 26-AA-0015)

Type of facility: Transfer Station

Facility Capacity: 15 tons per day

Anticipated Diversion Rate : 45%

Participating Jurisdictions: Mono County
Location of Facility: 400 Christie Lane, Benton CA 93512

Name of Facility: Bridgeport Transfer Station (SWIS 26-AA-0009)
Type of facility: Transfer Station
Facility Capacity: 25 tons per day
Anticipated Diversion Rate : 38%
Participating Jurisdictions: Mono County
Location of Facility: 50 Garbage Pit Road, Bridgeport, CA 93517

Name of Facility: Chalfant Transfer Station (SWIS 26-AA-0010)
Type of facility: Transfer Station
Facility Capacity: 15 tons per day
Anticipated Diversion Rate : 49%
Participating Jurisdictions: Mono County
Location of Facility: 500 Locust Street, Chalfant, CA 93514

Name of Facility: Paradise Transfer Station (SWIS 26-AA-0007)
Type of facility: Transfer Station
Facility Capacity: 15 tons per day
Anticipated Diversion Rate : 8%
Participating Jurisdictions: Mono County
Location of Facility: 9479 Lower Rock Creek Road, Paradise, CA 93514

Name of Facility: Pumice Valley Transfer Station (SWIS 26-AA-0017)
Type of facility: Transfer Station
Facility Capacity: 15 tons per day
Anticipated Diversion Rate : 25%
Participating Jurisdictions: Mono County
Location of Facility: 200 Dross Road, Lee Vining, CA 93517

Name of Facility: Walker Transfer Station (SWIS 26-AA-0012)
Type of facility: Transfer Station
Facility Capacity: 25 tons per day
Anticipated Diversion Rate : 49%
Participating Jurisdictions: Mono County
Location of Facility: 280 Offal Road, Coleville, CA 96107

Nondisposal Facilities Outside Mono County Jurisdiction (at least 5% recovery of total volume)

Name of Facility: Mammoth Transfer Station and Recycling Center
Type of Facility: Transfer Station
Estimated Amount of Waste Mono will transport to facility: Negligible.
Location of Facility: Mammoth Lakes

Transfer Stations Outside Mono County (less than 5% recovery of total volume)

Name of Facility: D&S Waste Transfer Station

Location of Facility: Smith Valley, NV

ⁱ State of California, Department of Finance, *E-4 Population Estimates for Cities, Counties, and the State, 2011-2013, with 2010 Census Benchmark*. Sacramento, California, May 2013

ⁱⁱ Anticipated Diversion based on 2012 calendar year diversion of total waste received.

DRAFT

**HOUSEHOLD HAZARDOUS
WASTE ELEMENT
of the
MONO COUNTY INTEGRATED
WASTE MANAGEMENT PLAN**

Mono County, California

Recommended for Adoption by the
Mono County Solid Waste Task Force

January 2015



Prepared by the
Mono County Department of Public Works
Post Office Box 457
Bridgeport, California 93517
(760) 932-5440

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1.0 INTRODUCTION

Hazardous chemicals are prevalent in modern society, not only in the commercial and industrial sectors, but also in the residential sector. Hazardous substances can be found throughout the home, garage, garden and hobby shop as constituents in products such as cleaners, paints, pesticides and glue. Once these hazardous products are no longer needed by the consumer, they become Household Hazardous Waste (HHW). Improper disposal of HHW can pose a risk to human health and the environment. Thus, HHW requires special handling.

A substance is classified as a hazardous waste by the Department of Health Services (DHS), California Code of Regulations (CCR) Title 22, if it demonstrates one of the following characteristics:

- Ignitability: flammable (e.g., lighter fluid, spot and paint removers).
- Corrosivity: eats away materials and can destroy human and animal tissue by chemical action (e.g., oven and toilet bowl cleaners).
- Reactivity: creates an explosion or produces deadly vapors (e.g., bleach mixed with ammonia based cleaners).
- Toxicity: capable of producing injury, illness, or damage to human, domestic livestock, or wildlife through ingestion, inhalation, or absorption through any body surface (e.g., rat poison, cleaning fluids, pesticides, bleach). Such products include toxic pesticides, caustic drain openers, ignitable paint thinners and other reactive or explosive materials.

By educating people about how to properly dispose of HHW, and providing adequate collection programs, a jurisdiction will reduce the amount of HHW that is improperly disposed of in the garbage, down the sewer, into storm drains, or directly onto the ground.

2.0 HHW MANAGEMENT GOALS AND OBJECTIVES

All household materials that have hazardous waste characteristics have been targeted for diversion since these materials are not accepted at sanitary landfills. The specific objectives of the Household Hazardous Waste Management Element are as follows:

2.1 Short-Term Planning Objectives (2014 - 2019)

- Reduce the amount of HHW disposed in County landfills.
- Reduce the amount of HHW generated within the County by advocating the use of products not harmful to the environment.
- Cooperate with the Town of Mammoth Lakes and adjacent counties to develop regional approaches to the management and disposal of HHW that will result in a lower management cost to each.
- Initiate public education programs addressing HHW management, usage and alternatives.

2.2 Medium-Term Planning Objectives (2014 - 2030)

- Promote the recycling and/or re-use of HHW by the County and general public.
- Continue cooperation with adjacent counties to implement regional HHW management plans.
- Continue education and public information programs implemented during the short-term planning period.

3.0 EXISTING CONDITIONS

3.1 Generation

The 1992 Household Hazardous Waste Element of the Integrated Waste Management Plan quantified HHW generation within Mono County (including the Town of Mammoth Lakes) as follows:

Material	Total Generation (pounds per year)
Waste Oil	14,000
Solvents	10,000
Pesticides	10,000
Dyes & Paints	64,000
Inorganic Liquids	2,000
Miscellaneous	16,000
Total	116,000

3.2 Programs

Since the development of the 1992 HHW Element, the County has implemented several programs that were identified at the time the Element was adopted. These programs, as they exist today, are described below.

3.2.1 Education

The County utilizes grant funds (when available) to promote awareness of HHW disposal options throughout the County. Over the years, this has been accomplished with direct outreach through booths at local events, print advertising, web presence on the County's website, as well as printed handouts and receipts from the Transfer Stations and landfills.

3.2.2 Load-Checking

Mono County implements a load checking program at the gatehouse of all County landfills and transfer stations. The effort is carried out primarily on self-haulers by gate attendants. This load checking program succeeds in directing hazardous waste to its proper disposal area, and increases awareness of the dangers and regulation of hazardous waste.

For commercial loads, spot-checkers regularly inspect loads of municipal solid waste and construction and demolition waste. When hazardous waste is identified, it is re-located to the proper disposal area.

3.2.3 Permanent HHW Collection Facility

The County constructed a Permanent HHW Collection Facility (PHHWCF) at the Benton Crossing Landfill in 2007. This facility is utilized as a central aggregating point for all HHW collected from the County's Batteries, Oil and Paint (BOP) sites, temporary sites, and mobile events throughout the County.

3.2.4 Temporary HHW Facilities (BOP only)

The County maintains 6 sites at County Transfer Stations that collect batteries, oil, and paint (BOP). The Town of Mammoth Lakes has a 7th location, at the Mammoth Disposal Transfer Station within the Town. These sites are utilized for the temporary collection and storage of batteries, oil and paint until the materials can be safely transported to the PHHWCF at Benton Crossing.

3.2.5 Mobile Events

As funding permits, the County implements mobile collection events throughout. These events are implemented with County staff and County equipment. In recent years these events have been funded through CalRecycle HHW grant opportunities.

3.3 Collection

The results of these programs have been well-documented over the years since the first HHW Element was adopted. Annual reports have proven that Mono County programs have been successful in collecting a significant amount of HHW and removing the material from the waste stream.

In 2013, Mono County collected over 220,000 pounds of HHW. At 15.4 pounds per capita, the County's efforts ranked third out of California's 58 counties.

In 2014, the county collected over 290,000 pounds of HHW for recycling or proper disposition.

4.0 HOUSEHOLD HAZARDOUS MANAGEMENT ALTERNATIVES

The program alternatives that were considered in early HHW Elements include the following:

4.1 Collection Programs

4.1.1 Periodic Collection Programs.

One or two day collection ("round-up") events are generally preceded by an intensive public information campaign designed to inform the public when and where the event would take place, to identify what types of materials would be accepted and how those materials should be packaged when brought to the collection site. Residents can bring their HHW (generally up to 5 gallons or 50 pounds per household per trip) to the facility. All HHW received is packed in drums that are sealed and removed from the site at the end of the event.

4.1.2 Permanent Collection Facility

A permanent HHW collection facility accepts HHW delivered by city residents at a fixed location. These facilities are generally open year-round. Permanent facilities are usually sited to allow access from major population centers and can be designed to incorporate recycling and source reduction opportunities. Recycling may be accomplished by accumulating volumes of materials such as used oil, latex paint, or batteries for reprocessing into new materials. Source reduction opportunities include the establishment of a waste exchange program. In fact, the DHS and CIWMB encourage the exchange of materials as a means of waste reduction as long as safeguards are maintained. The facility would be open on a regular schedule for a limited number of hours per week.

A trained County employee would be available during the hours of operation to inspect, receive and pack the HHW. The quantity received from anyone household would be limited to 5 gallons or 50 pounds per day. Current State regulations require that the stored material remain on site no more than one year. Arrangements would be made with a licensed hazardous waste disposal firm to service the facility.

Although trucks from the disposal firm make weekly trips down the Route 395 corridor, the servicing schedule would be coordinated with other counties and municipalities along the route that have implemented similar programs in order to make the removal of the packed HHW from all of the facilities as efficient as possible.

4.1.3 Mobile Programs

A mobile collection unit consists of a custom-made trailer equipped with an office, laboratory and waste packaging and storage areas. The unit is moved to pre-scheduled locations and collects HHW for a maximum of two days per site. The operation and activities at the collection site are similar to those for a periodic collection event. The annual schedule of collections and the locations of the mobile unit should be made available to the public.

4.1.4 Fee-for-Service, Door-to-Door, or Curbside Collection

Fee for Service: These programs involve charging the residents a flat fee or a fee based on the types and quantity generated. Door-to-Door Programs: Collection of HHW would be made on a regular schedule or on request. A custom collection vehicle would be required that would include facilities for analyzing, handling, packaging and transporting the material to be received. Curbside Collection: HHW would be placed at the curb and collected by a custom vehicle on a regular schedule.

4.1.5 Load Checking Programs

Loads of waste are checked (usually on a random basis) at a landfill or transfer station to screen for the presence of any hazardous materials. Logs of the loads sampled and the results of the inspections are kept by the facility operator and reported to the CIWMB. The landfill operator would inspect in-coming loads of self-haul waste (usually delivered in autos or pick-up trucks, and would conduct random inspections of loads from commercial collection vehicles.

4.1.6 Recycling Program For Waste Oils, Paints and Batteries

A recycling program for HHW targets materials that can be readily recycled and can reduce the high costs of disposal at a permitted hazardous waste facility. Many communities have integrated recycling programs into their existing collection events, drop-off centers, or door-to-door pickup programs. The recycling alternative considered for the County targets waste oil, paints and batteries. By recycling HHW the County can help divert these materials from disposal and preserve resources.

4.1.7 Public Education and Information Program

To secure the cooperation and participation of the public, a comprehensive and ongoing HHW information and education program is required. This program would include periodic items in the local media that would address:

- Identification of HHW
- Effect of improper HHW disposal on the environment
- Proper handling and disposal of HHW
- Alternatives to the use of toxic products in and around the home

The program would also include posters in prominent locations in each one of the population centers and inserts in County mailings such as tax or utility bills.

Countywide public education activities may also include the following:

- Develop and distribute a guidebook that would assist the County in answering questions from residents on proper management and disposal of hazardous materials in the home.

The guidebook would contain suggestions for alternative less-toxic products. A directory of public agencies and organizations involved with management of toxics would also be included in the guidebook.

- Update and distribute a calendar of County-sponsored HHW collection events and a list of County contacts.
- Establish contact with retailers to discuss the role they can play in HHW education.
- Establish school contacts to integrate hazardous waste curriculum into the schools.
- Advertise HHW collection programs in the County.
- Post signs inside buses, at bus stops and on billboards and place posters in stores.
- Provide media coverage including public service announcements and press releases to area papers, TV and radio stations and community newsletters.
- Distribute inserts in garbage, utility or tax bills.
- Distribute fliers at libraries, community meetings, landfill entrance facilities, churches and schools.
- Print advertisements on grocery bags.
- Provide a Hotline telephone number and establish an appointment mechanism. Use the appointment telephone call as an opportunity to educate residents.

- Determine if a substance is hazardous. Explain its hazardous nature.
- Emphasize less-toxic alternative products and methods.
- Expand work with retailers including: workshops for retailers about less-toxic alternative products and shelf labeling; provide HHW posters; provide auto parts stores, nurseries and hardware stores with signs and handouts or both, on the safe use and disposal of hazardous products.

5.0 EVALUATION OF PROGRAM ALTERNATIVES

This section presents a standard criteria and evaluation of alternatives that can be used when considering changes to, or enhancements of existing County programs in the future.

5.1 Collection Programs

5.1.1 Periodic HHW Collection Programs

Effectiveness in Reducing HHW in the Waste Stream:

Collection events are considered moderately effective at diverting HHW because they offer residents disposal and recycling options for their HHW. They also result in increased awareness about the dangers of improperly disposing of hazardous materials. However, because the events are held only from time to time they do not provide residents with an ongoing option, thus limiting the effectiveness.

Program Cost:

\$77,000/event (based on similar programs with crew on site two days, one day collection, 500 households served).

Institutional Factors:

A contract is issued for each event and the contractor must be licensed to manage the event. The host community must obtain a permit from the California Department of Health Services. A permit-by-rule permitting procedure has been proposed by the Department of Health Services.

Consistency of Local Policies:

Collection events are consistent with local policies.

Facility Needs:

Collection events do not require expansion or development of facilities.

Availability of Markets:

Collection events divert latex paint, oil and batteries from the waste stream through recycling. Non-recyclable HHW collected through the events is recycled or incinerated by authorized processors. Ongoing waste exchanges where residents can obtain usable products that otherwise would be discarded are not ideal at collection events due to the short duration and transient nature, although they are possible.

Ease of Implementation:

The event must be preceded by a comprehensive and intensive public education program. The program cost vs. the amount of material actually collected is a major disadvantage of this type of program.

Hazards:

Potential public health risks and safety hazards associated with periodic collection events include spills, fires, leaks, or explosions resulting from improper collection, storage, handling, or transport of hazardous materials. However, proper equipment, operation and health and safety training of event workers minimize these potential hazards.

Program Flexibility:

Due to operational limitations, collection events have a limited ability to respond to changing conditions. In addition, collection events do not allow for flexibility in recycling option such as accumulation of larger volumes of material, or the establishment of waste exchange programs.

Shift in HHW Generation:

This alternative is not expected to create shifts in waste type generation.

5.1 .2 Permanent HHW Collection Facility

The County currently maintains a Permanent HHW Facility at the Benton Crossing Landfill. Upon closure of Benton Crossing Landfill, the permanent HHW Facility would need to be relocated and re-established at an alternate location.

Effectiveness in Reducing HHW in the Waste Stream:

A permanent collection facility is effective in reducing the amount of HHW disposed of in the landfills by offering residents ongoing disposal, recycling and source reduction options.

Program Costs:

Costs associated with developing and operating a permanent HHW collection facility are considered high. To reduce disposal fees, items such as paint, oil and automotive batteries can be recycled and a waste exchange program may be implemented.

Institutional Factors:

Permitting requirements for a permanent HHW collection facility may present a temporary barrier to the implementation of this alternative.

Consistency with Local Policies:

A permanent facility is identified as a disposal option in the Mono County Hazardous Waste Management Element.

Facility Needs:

This alternative requires the development of a collection and storage facility. A HHW facility must meet specific state and federal safety and operating standards. A facility should be designed to prevent spills or leaks and prevent incompatible wastes from mixing and should include explosion proofing, grounding columns, proper containment, sufficient ventilation and adequate emergency response and safety equipment. A permanent facility should be situated on an impervious surface and fenced for security. An area for analyzing unknowns is also needed. Tracking records accounting for all wastes managed at the facility should be maintained.

Availability of Markets:

End uses for selected HHW are considered relatively stable. Reuse of products can be promoted through waste exchanges or organized referrals. Non-recyclable HHW is disposed of properly at permitted hazardous waste disposal or incineration facilities.

Hazards:

Potential public health risks and safety hazards associated with a permanent facility include spills, fires, leaks, or explosions resulting from improper collection, storage, handling, or transportation of hazardous materials. However, proper facility siting, equipment, operation and health and safety training for facility staff would minimize any potential hazards. Therefore hazards are considered known and considered controllable.

Program Flexibility:

A permanent facility is considered highly flexible because it can accommodate changing social conditions by increasing or decreasing the days or hours of operation as needed. A permanent facility can process participants more efficiently than 1-day collection events because of the dedicated staffing and operational characteristics of the facility. Recycling opportunities are enhanced because of the ability to accumulate material over a longer period, resulting in larger volumes that are attractive to recyclers. The location of the facility adjacent to an existing County facility would allow for the part-time use of an employee already on the County payroll.

Change in HHW Generation:

No change in waste generation is expected to result from implementation of this program.

5.1.3 Temporary HHW Collection Facilities

The County currently maintains 6 Temporary HHW Collection Facilities, one at each Transfer Station.

Effectiveness In Reducing HHW In the Waste Stream:

These types of programs have the same limited effectiveness as periodic collection events.

Program Cost: The costs for the advertising, logistics and coordination of the program would be in the range as those for a periodic event. Actual cost of the event would be higher because of the need for a more specialized vehicle.

Institutional Factors:

Same as for a periodic collection event.

Consistency With Local Policies:

The program would be consistent with the County policy of minimizing the amount of HHW entering the waste stream.

Facility Needs:

No permanent facility in the vicinity of the County would be required.

Availability of Markets:

Same as for periodic collection events.

Ease of Implementation: Same as for periodic collection events.

Hazards:

Same as for periodic collection events.

Program Flexibility:

High

Change in HHW Generation: None anticipated

5.1 .4 Fee-for-Service, Door-to-Door, or Curbside Programs

Effectiveness in Reducing HHW In the Waste Stream:

Fee for service program have the effect of discouraging participation. Door-to-door and curbside collection event are effective in reducing the amount of HHW entering the waste stream since customized, personal collection service is provided.

Program Cost:

The cost per household served would be extremely high given the high capital costs of the program and the limited number of households to be served.

Institutional Factors:

Identification of a program operator, establishment of a contractual relationship with the County if the operator was a private firm, permitting.

Consistency With Local Policies:

There are currently only limited curbside trash collection programs in the County unincorporated areas.

Facility Needs:

A facility for the storage of the collected materials would be required.

Availability of Markets:

Markets for collected materials would be the same as those for permanent collection facilities.

Ease of Implementation:

Implementation will be hampered by the lack of any existing refuse collection systems.

Hazards:

Potential public health risks and safety hazards associated with collection programs include spills, leaks, or explosions resulting from improper collection, storage, handling, or transportation of hazardous materials. However, proper equipment operation and health and safety training for collection personnel will minimize any potential hazards. However, because of the transportation of collected material throughout the County, the potential hazards are greater than for a permanent facility. Hazards would also be caused by the setting out of materials for collection.

Program Flexibility:

High

Change in HHW Generation:

None

5.2 Load Checking Programs

Mono County currently maintains a load checking and spot-checking program at all County sites. These programs, while of low cost, are not effective in removing small quantities of HHW from the waste.

Effectiveness in Reducing the Amount of HHW in the County Landfills:

Moderate

Program Costs:

The assigned landfill operator would be responsible for inspecting in-coming loads and conducting random inspections of loads from commercial collection vehicles.

Institutional Factors:

The success of this program is dependent on the implementation of the County's plans for consolidating, enclosing, and staffing the existing landfills. Landfill operators will require training and record keeping procedures must be established.

Consistency With Local Policies:

This program would be consistent with the County's policy of eliminating HHW from the landfills.

Facility Needs:

None

Availability of Markets:

N/A

Hazards:

None anticipated. All inspectors will be trained in the proper identification and handling of HHW.

Program Flexibility:

High

Change in HHW Generation:

None anticipated.

5.3 Recycling Program For Waste Batteries, Oil and Paint (BOP)

Effectiveness in Reducing the Amount of HHW Disposed in County Landfills:

BOP Recycling programs are very effective in reducing the volume and weight of hazardous materials disposed of at sanitary landfills and hazardous waste disposal facilities.

Program Cost:

Recycling BOP reduces the costs of disposal for HHW collected during collection events, door-to-door events, or at a permanent facility. No specific costs are associated with a recycling program because it can be implemented in conjunction with these other collection programs.

Institutional Factors:

Institutional barriers are anticipated to have little impact on this alternative. Effective January 1, 1991, pursuant to AS 2597, HHW recycling facilities will no longer need a hazardous waste permit if materials accepted are limited to; (1) latex paint, (2) used oil, (3) antifreeze, (4) spent lead acid batteries, (5) nickel-cadmium, alkaline, carbon-zinc and other small batteries. Section 25250.11 (a), Health & Safety Code, exempts from its HHW permit requirements "any person who receives used oil from consumers or other used oil generator," as long as no more than 20 gallons of used oil are received at a time and containers hold no more than 5 gallons each. The DHS will allow a facility collection event to bulk latex paint if it is properly authorized to accept it as one of its household hazardous wastes. Government Code Section 66798.9 (Statute, 1989) provides immunity for local agencies operating HHW programs unless the agencies act negligently. Additional immunity from state liability is provided in Health & Safety Code, Section 25366.5, for local governments or their contractors who are running HHW facilities and events.

Consistency with Local Policies:

Recycling BOP is consistent with the County's policy of recycling and providing cost effective collection options for HHW.

Need for New Facilities:

A storage facility is needed to recycle BOP. Recycling BOP can be integrated into existing facilities and programs, including curbside collection programs, drop-off centers and periodic, mobile and permanent collection facilities.

Availability of Markets:

Section 5.2 describes the available markets for recycled BOP.

Ease of Implementation:

Recycling operations can be relatively easy to implement with existing or planned programs.

Hazards:

Recycling BOP produces minimal hazards. Some hazards are associated with latex paint. Latex paint that has been stored for many years may contain mercury or lead. Older latex paint, improperly labeled paint, paint that is not in its original container and possibly contaminated paint should be disposed of instead of recycled to reduce potential hazards. Other potential public health risks and safety hazards associated with recycling programs include spills, fires, leaks, or explosions resulting from improper collection, storage, handling, or transportation of hazardous materials. However, proper design, equipment and health and safety training can minimize any potential hazards.

Program Flexibility:

Recycling programs are generally flexible to changing conditions. The volumes of materials accepted can fluctuate based on demand and public awareness. Increasing the frequency of pickup by the end users can address these fluctuations.

Change in HHW Generation:

This alternative is not expected to create shifts in waste type generation.

5.4 Public Education and Information

Education and public information are important elements of HHW programs. Successful programs require ongoing efforts to inform residents of the hazards of some household materials and the proper avenues available for its disposal. The program should serve to educate consumers about the hazards of household products and the proper management of these products. An education program should encourage the use of less toxic products, buying household hazardous materials only in quantities that will be used and proper storage and proper disposal of HHW. An effective program will inform the community about the available recycling and disposal option, in addition to educating the public about the dangers of HHW and nonhazardous alternatives.

Effectiveness in Reducing HHW Disposal in the Landfills:

Public education and information are effective methods for increasing awareness about proper disposal of HHW and may increase participation during collection programs. Offering the community information about safer alternatives to HHW can reduce the amount of HHW being generated in the County. Education about safer alternatives to hazardous materials and information regarding collection events will work to help eliminate HHW from the waste stream entering the area landfills.

Program Cost:

The public education program for HHW can be part of a larger education program incorporating many components of the Integrated Waste Management Plan. Because the public education and information program is an integrated effort, the costs associated with the HHW element cannot be separated.

Institutional Factors:

There are no barriers to offering the public educational materials.

Consistency with Local Policies:

Education and public information are consistent with County policies.

Facility Needs:

No additional facilities are needed. Existing facilities could serve as locations for seminars and educational workshops.

Availability of Markets:

Not applicable.

Ease of Implementation:

A public education and information program is relatively easy to implement in the short-term planning period. The County will make use of existing mailings to residents and utilize the general media to the extent possible.

Hazards:

None

Program Flexibility:

A public education program should be flexible to account for changing conditions in demographics, products, etc. The program should serve to educate consumers about the hazards of household products and

the proper management of these products. An education program should encourage the use of less toxic products, buying household hazardous materials only in quantities that will be used and proper storage and proper disposal of HHW when the products are no longer needed.

Change in HHW Generation:

This alternative is not expected to create a significant shift in the type of HHW generation, but it may create an overall reduction in HHW generation.

6.0 PROGRAM SELECTION

Temporary BOP facilities have been developed at all County Transfer Stations. A Permanent HHW Facility for the collection of additional HHW products has been constructed and is fully operational at the Benton Crossing Landfill. Education and outreach programs are selected an ongoing. Mobile events are conducted, time and resources permitting.

These facilities are staffed by employees trained in the proper identification, handling, and management of household hazardous waste.

In 1992, the Local Task Force identified the selected programs based on what would provide the most cost effective service for County residents, with an adequate level of convenience. Those programs have been implemented over time, and are currently ongoing.

Considering the current success of the existing programs, and the ability of the Solid Waste Enterprise Fund to fund the ongoing operation of the programs and to avail itself of grant opportunities, it is believed that all existing programs, with existing funding mechanisms, represent the highest and best programs for meeting the County's HHW collection needs for the next planning period.

7.0 PROGRAM IMPLEMENTATION

The Solid Waste Division of the County Department of Public Works is responsible for program implementation. Selected programs are currently implemented, and no further efforts are expected at this time. The intent is to continue with existing programs and the monitoring and evaluation of those programs. The expected closure of Benton Crossing Landfill creates a distant need to site and relocate the existing PHHWCF.

8.0 MONITORING AND EVALUATION

To effectively monitor the success of the selected programs, several tasks should be performed:

- Comply with CalRecycle reporting requirements, specifically Form 303
- Consider effectiveness of programs by comparing pounds per capita of HHW collection to comparable counties within the state.
- Periodically survey program participants to determine who is participating and if buying practices have changed to reduce the quantities of HHW generated.
- Attempt to quantify any source reduction of HHW.

9.0 EDUCATION AND PUBLIC INFORMATION

9.1 Objectives

9.1.1 Short Term-Objectives (ongoing)

- To inform the public of the toxic nature of materials used in and around the home
- To inform the public of the proper means of disposing of HHW
- To encourage the use of alternatives to HHW

9.1.2 Medium-Term Objectives (ongoing)

- To continue existing public education activities
- To promote a decrease in the amount of HHW generated

9.2 Existing Conditions

The existing education and outreach programs include print advertising, outreach at special events, materials distributed at County Transfer Stations, information distributed on gate receipts, as well as existing signage at the County sites. During mobile collection events, materials are distributed and opportunities for disposal are provided to the general public.

9.3 Program Implementation

Two specific audiences will be targeted:

- Consumers of household products that contribute to HHW generation
- School children

The County will assume responsibility for coordination of the HHW public education and information program, but will rely on the school administration, teaching staff and local merchants for much of the implementation. The County will distribute general program guidelines and objectives and provide the schools with access to sources of information on the proper use and disposal of household toxics. The County will also provide local merchants with the program guidelines and objectives and will supply the merchants with information or sources of information on the toxic-containing products that they sell.

Monitoring and evaluation of the program will be performed by observing the participation in the permanent HHW collection facility and the amount of HHW discovered in annual reviews of the waste disposal characterization.

10.0 FUNDING

The County has received CalRecycle grants for the construction of the PHHWF, as well as some enhancements since it was constructed. Continuing operations, outreach, and training are funded in part through CalRecycle OPP Grants. The County received an HD20 grant for improvements to our collection infrastructure, outreach, and mobile events. Disposal costs and remaining operational costs are funded by the Solid Waste Enterprise Fund.

Future funding for the HHW programs will continue to come from the available grant opportunities and the Solid Waste Enterprise Fund. Should the PHHWC need to be relocated, the County will seek a grant for that purpose.