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SOLID WASTE MANAGEMENT COMMITTEE/
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July 13, 2020

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California Department of Resources Recycling and Recovery
P.O. Box 4025
Sacramento, CA 95812

Ms. Karen Ross
California Department of Food and Agriculture
1120 N Street
Sacramento, CA 95814

REQUEST TO INVESTIGATE CONCERNS REGARDING HANDLING OF COVID-19 CONTAMINATED SOLID WASTE AND POTENTIAL COMMUNITY HEALTH RISKS

The Los Angeles County Solid Waste Management Committee/Integrated Solid Waste Management Task Force (Task Force) is deeply concerned with the handling of COVID-19 contaminated solid waste at major landfills and other solid waste facilities and the potential health risks it may pose to workers and the community.

For the reasons outlined in this letter, the Task Force respectfully requests that California Department of Resources Recycling and Recovery (CalRecycle) and the California Department of Food and Agriculture, in concert with the California Department of Public Health and local Health Officers, investigate the concerns expressed herein, evaluate potential health impacts, and implement measures to ensure the health, safety, and well-being of landfill and solid waste facility workers and California communities.

COVID-19 Contaminated Solid Waste Handling and Potential Risk to the Community

According to guidance issued by the Federal Occupational Safety and Health Administration (OSHA) to Solid Waste and Wastewater Management Workers and Employers (<https://www.osha.gov/SLTC/covid-19/solid-waste-wastewater-mgmt.html> refer to as Enclosure), **certain waste management activities carry a very high risk**

of exposure. These include shredding waste that “could re-aerosolize potentially infectious SARS-CoV-2 [i.e., COVID-19] from environmental surfaces” (emphasis added).

The Task Force is concerned that handling of COVID-19 contaminated solid waste at the working face of major landfills may be an activity that “could re-aerosolize potentially infectious SARS-CoV-2”. Major landfill operations tear through and compress thousands of trash bags and pierce through alternative daily covers placed the night before, thereby exposing landfill workers. Adverse wind conditions can also carry those emissions down into the surrounding communities.

This situation is of great concern to the Task Force. Therefore, the Task Force requests that your agencies investigate these concerns, evaluate potential health impacts to the community (such as by testing workers and community residents on a regular basis and determining whether the virus can spread through the waste at landfills), and take appropriate measures to ensure the health, safety, and well-being of the residents and major landfill/solid waste facility workers.

Also, since there is much that we still do not know about COVID-19, such as the different ways it may propagate, the conditions that cause it to mutate, how long it survives under various climatic conditions, the potential risk to humans when it becomes airborne, and the various pathways through which it can spread, it is extremely important to evaluate the potential risk of spreading the virus through the various waste management and recycling activities.

COVID-19 Contaminated Organic Waste and the Senate Bill 1383 (SB 1383) Organic Waste Recycling Regulations

California is about to embark in a massive, unprecedented effort to recycle its organic waste, with composting and mulching being CalRecycle’s preferred method of recycling. As required by the proposed CalRecycle SB 1383 Organic Waste Recycling Regulations (currently before the State Office of Administrative Law), residents and businesses in every city and county will be required to recycle organic waste. Considering the incredibly rapid spread of COVID-19, its capacity to propagate, mutate, and survive under various climatic conditions, the Task Force is very concerned that recycling and returning COVID-19 contaminated organic waste to the economic stream, for uses such as mulch or compost, may pose a high risk of exposure to infection for composting and mulching facility workers and users of compost and mulch made from COVID-19 contaminated organic waste.

Therefore, the Task Force also urges your agencies, in concert with **the California Department of Public Health** and local Health Officers, to investigate whether the virus can survive in the food waste and through the mulching/composting process, assess the

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potential risk of human exposure to the virus through the mulch and compost, and implement appropriate measures to mitigate potential impacts. The Task Force strongly recommends that CalRecycle consider a delay in the implementation of the SB 1383 (Chapter 395 of the 2016 state statutes) regulations until this issue has been thoroughly assessed and mitigated.

The Task Force would like to express its appreciation to each of your agencies for its efforts during the current emergency and looks forward to your responses. Should you have any questions regarding this matter, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Mayor, City of Rosemead

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Enc.

cc: California Department of Public Health, (Sonia Y. Angell)
California Environmental Protection Agency, (Jared Blumenfeld)
CalRecycle (Mark de Bie, Matt Henigan)
Los Angeles County Department of Regional Planning (Maria Masis,
Edgar De La Torre)
Los Angeles County Department of Public Health (Barbara Ferrer,
Shikari Nakagawa-Ota, Maurice Pantoja, Dorcas Hanson-Lugo)
South Coast Air Quality Management District (Wayne Natri, Terrence Mann)
Sunshine Canyon Landfill Local Enforcement Agency (Shikari Nakagawa-Ota,
Dorcas Hanson-Lugo, David Thompson)
Sunshine Canyon Landfill Technical Advisory Committee (Lisa Webber,
Jon Sanabria)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter)
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
Each Member of the Task Force Facility and Plan Review Subcommittee