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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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March 17, 2022

The Honorable Bill Quirk, Chair
Assembly Environmental Safety and Toxic Materials Committee
1020 N Street, Room 171
Sacramento, CA 95814

Dear Assembly Member Quirk:

SUPPORT IF AMENDED/OPPOSED UNLESS AMENDED – ASSEMBLY BILL 1817 (TING AND CRISTINA GARCIA) AS AMENDED ON MARCH 15, 2022 – PRODUCT SAFETY: TEXTILE ARTICLES: PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES (PFAS)

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **Supports if Amended/Opposes Unless Amended** Assembly Bill 1817 (AB 1817), as Amended on March 15, 2022.

The proposed legislation, if enacted, would prohibit, beginning January 1, 2024, any person from distributing, selling, or offering for sale in the state any textile articles [as defined in the proposed Health and Safety Code, Subdivision 108970 (f)] that contain regulated perfluoroalkyl and polyfluoroalkyl substances or PFAS as defined in the proposed Health and Safety Code, Subdivision 108970 (d). The bill also requires a manufacturer to use the least toxic alternative when replacing regulated PFAS in textile articles to comply with these provisions.

Neither the United States Environmental Protection Agency nor the California Environmental Protection Agency (Cal EPA) has yet to set an action level for various PFAS substances. To achieve the intent of the proposed legislation to protect public health and the environment, Section 108971 of the proposed legislation should be expanded by adding Subdivision 108971 (c) as listed below:

- *"108971. (c) Cal EPA shall conduct needed studies, tests, and/or analysis to establish the concentration levels of various PFAS family substances that are determined to be safe to humans and the environment."*

Further, products containing PFAS are interfering with jurisdictional solid waste recycling/diversion activities including compliance with organic waste reductions as mandated by SB 1383 (2016). Currently, products containing PFAS substances cannot be easily identified, separated, or recycled and must be sent to Solid Waste Landfills, as defined in Section 40195.1 of Public Resources Code. Thus, the proposed legislation should be expanded by adding Subdivision 108971 (d) as follows:

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- **"108971.** (d) Any products containing PFAS substances landfilled prior to the CalEPA establishing the concentration level per subdivision 108971 (c) must not count as disposal for the purposes of compliance with the organic waste reductions as mandated by SB 1383 (2016)."

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

Based on the foregoing, the Task Force position on AB 1817 is **"Support if Amended/Oppose Unless Amended."** If you have any questions or would like to discuss the suggested amendments, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Sam Shammass, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

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cc: Assembly Member Cristina Garcia
Assembly Member Friedman
Assembly Member Ting
Senator Stern
Each Member and staff of the Assembly Environmental Safety and Toxic Materials Committee
California State Association of Counties
League of California Cities – Los Angeles County Division
Each Member of the Los Angeles County Board of Supervisors
Fesia A. Davenport, Los Angeles County Chief Executive Officer
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each City Recycling Coordinator in the County of Los Angeles
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force