



LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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DONALD L. WOLFE
CHAIRMAN

November 13, 2007

Ms. Margo Reid Brown, Chair
California Integrated Waste Management Board
Cal-EPA Building
1001 "I" Street
Sacramento, CA 95812-4025

Dear Chairperson Brown:

PROPOSED REGULATIONS ON LANDFILL CLOSURE AND POSTCLOSURE COST ESTIMATES, DATED AUGUST 3, 2007

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, I would like to extend our support with suggested amendments for the proposed regulations and to also commend the California Integrated Waste Management Board (Waste Board) and its staff for their efforts in developing the proposed regulations.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and its 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.

We have reviewed the proposed regulations. The following comments are provided.

1. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21780: CIWMB–Submittal of Closure and Postclosure Maintenance Plans, Page 1.

The Subsection (b) should be expanded to require the landfill operator to also provide two copies of each document to the local jurisdiction planning agency.

We strongly believe that this will enhance communications among state, regional, and local regulatory agencies.

2. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21790: CIWMB–Preliminary Closure Plan Contents, Page 2.

The Subsection (b)(8) should be expanded to add a new item (G) to read as follows: "(G) Site Re-Vegetation and Landscaping."

We believe a Landfill, like any other business, should complement and enhance the community. Therefore, the plan should include the cost to re-vegetate and landscape the site so as to enhance and blend with the surrounding community. The site, upon closure or during postclosure maintenance period, should not degrade or become an eye-sore to the community.

3. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21815: CIWMB-General Criteria for Cost Estimates, Page 3.

We support the proposed item (d) which states "Cost estimates shall include the cost for all activities yet to be completed even if the activity is tentatively planned to occur or be completed prior to closure or completion of postclosure maintenance"

The proposal as a part of the Phase I closure and postclosure maintenance cost estimate regulations is appropriate since it affects the Plans Content and what environmental protection and control system activities must be included in determining the closure or postclosure maintenance cost estimates. This is an important step in not only ensuring that landfills operate under the most appropriate technical and environmental standards protecting public health, safety and the environment, but also in ensuring that the citizens of California are not left holding the bag at anytime during the closure or postclosure maintenance period, should the owner/operator default on its obligations or be in bankruptcy. We believe that the statement is consistent with the intent of AB 2296 which requires the Waste Board adopt this year a set of regulations that deal with improving the closure and post closure maintenance cost estimates.

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4. Title 27, Division 2, Chapter 4, Subchapter 4, Section 21820(b)(3), CIWMB–Closure Cost Estimates, Page 4.

We request that the Subsection (b)(3) be expanded to include a new item (F) to read as follows: "(F) Site Re-Vegetation and Landscaping."

We believe a landfill, like any other business, should complement and enhance the community. Therefore, the plan should include the cost to re-vegetate and landscape the site so as to enhance and blend with the surrounding community. The site, upon closure or during post-closure maintenance period, should not degrade or become an eye-sore to the community.

I appreciate your consideration and look forward working with you and your staff to ensure our disposal infrastructure continues to protect public health and safety and the environment. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,

Margaret Clark

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

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cc: Each Member of the California Integrated Waste Management Board
Executive Director, California Integrated Waste Management Board (Mark Leary)
California Integrated Waste Management Board (Ted Rauh, Michael Wochnick)
Each Member of the Los Angeles County Integrated Waste Management Task Force