



DONALD L. WOLFE
CHAIRMAN

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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August 10, 2006

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

Dear Chairperson Brown:

**LONG-TERM POSTCLOSURE MAINTENANCE, CORRECTIVE ACTION AND
FINANCIAL ASSURANCE REQUIREMENTS FOR SOLID WASTE LANDFILLS
AGENDA ITEM 13, JULY 18, 2006**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) I want to thank you and, the California Integrated Waste Management Board for initiating the rulemaking process to clarify and update financial assurance requirements for municipal solid waste landfills and to further study corrective action requirements at these landfills. We believe this action will strengthen public trust and confidence that funds and resources will be available until a landfill no longer poses a risk to public health and safety and the environment or even if a landfill owner/operator defaults on his obligations. Mitigating the long-term impact of our landfills is a high priority and a shared responsibility, in which landfill owners/operators and state and local regulators play vital and indispensable roles.

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 10 million. Consistent with these responsibilities, and to ensure a coordinated and cost-effective 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, the County of Los Angeles Board of Supervisors, the City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

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California municipal solid waste landfills play a necessary role in managing the variety of wastes generated by residents and businesses on a daily basis. They operate under the most stringent environmental standards in the country in order to protect public health and safety and the environment. However, once a landfill closes, it is crucial that an adequate financial assurance mechanism be in place. This financial assurance would protect the community and environment from any unforeseen ill effects of the landfill, and safeguard taxpayers from assuming the financial burden of fulfilling the closure, post-closure, and maintenance activities, including corrective activities, in the event the landfill owner/operator defaults on his obligations. The Waste Board's commencement of the rulemaking process is an important step in making this "safety net" a reality.

In addition to the Waste Board staff recommendations presented to the Waste Board on July 18, 2006, the Task Force respectfully requests the Waste Board establish a timeline for the commencement and conclusion of the rulemaking process. This would provide the public and stakeholders with a sense of finality to the process as well as bolster the Waste Board's credibility that it is determined to resolve this matter expeditiously. In addition, we request the PowerPoint landfill graph entitled, "Landfill Decomposition" presented by staff at the July 18, 2006, Waste Board meeting, Agenda Item 13 (as well as on July 10, 2006, at the Permitting and Enforcement Committee Meeting Agenda E), be updated to provide the specific measurement units used for the X and Y-axis. Currently, it is not possible to decipher the decomposition period versus the quantity of "gas/leachate" generated, which is important to policy makers in gauging how long a landfill poses a risk to the community and the environment. We respectfully request a response be provided to us regarding the aforementioned timeline and the landfill decomposition graph.

I appreciate your consideration and look forward to 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
California Integrated Waste Management Board (Mark Leary, Howard Levenson
Richard Castle)
Each Member of the County of Los Angeles Board of Supervisors
Each City Mayor in the County of Los Angeles
California State Association of Counties
League of California Cities
League of California Cities, Los Angeles County Division
Southern California Association of Governments
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Each Member of the Los Angeles County Integrated Waste Management Task
Force
Each City Recycling Coordinator