



DONALD L. WOLFE
CHAIRMAN

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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April 26, 2006

Mr. Alan C. Lloyd
Agency Secretary
Cal/EPA Headquarters Building
1001 "I" Street
Sacramento, CA 95812-2815

Dear Secretary Lloyd:

SUNSET OF UNIVERSAL WASTE DISPOSAL EXEMPTIONS

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), we wish to thank Ms. Mary Misemer of the Department of Toxic Substances Control (DTSC) for providing a helpful and informative presentation on universal waste at our February 23, 2006, meeting. At this meeting, the Task Force reiterated its concerns with the sunset of the universal waste disposal exemptions for households and would like for DTSC to address subsequent concerns.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 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. 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, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

The Task Force is concerned that the sunset of the universal waste disposal exemptions for households has been implemented without a strategic plan to assist local governments to manage universal waste. The Task Force recommends a more proactive approach by the DTSC to account for enforcement, outreach, funding, and long-term planning to manage this waste. It is also our concern that the DTSC's limited risk-based enforcement and outreach will not completely prevent the disposal of all universal waste from landfills.

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The Task Force also requests that DTSC develop a funding mechanism to assist local governments with new and existing programs that collect household hazardous and electronic waste. Los Angeles County's Household Hazardous Waste Collection Program has been in operation since 1988 and has been collecting electronic waste since 2002. Currently, existing programs such as the County of Los Angeles' have been denied grant funding by the California Integrated Waste Management Board. Local governments should not be excluded from grant funding for being proactive in collecting universal waste prior to the sunset of the disposal exemption.

The Task Force is ready to work with your agency to further develop plans to establish the necessary infrastructure and funding mechanisms to appropriately manage these categories of universal waste. We appreciate the opportunity to comment and look forward to your response. If you have any questions, please contact Mr. Mike Mohajer, of the Task Force, at (909) 592-1147.

Sincerely,



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

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cc: Governor Arnold Schwarzenegger
Governor's Cabinet Secretary (Fred Aguiar)
Cal-EPA
Each Member of the Los Angeles County State Legislative Delegation
California Integrated Waste Management Board
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
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Solid Waste Association of North America
Each Member of the Los Angeles County Integrated Waste Management Task Force
Each City Recycling Coordinator in Los Angeles County
Department of Toxic Substances Control (Mary Misemer)