



**LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org**

**DONALD L. WOLFE
CHAIRMAN**

October 30, 2006

EP-2

Mr. John Bell
California Integrated Waste Management Board
Permitting and Enforcement Division
P.O. Box 4025, M.S. 16
Sacramento, CA 95812-4025

Dear Mr. Bell:

**PROPOSED REGULATIONS
ACTIVE DISPOSAL SITE GAS MONITORING AND CONTROL**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to thank the California Integrated Waste Management Board for the opportunity to provide comments on the proposed regulations, dated December 13-14, 2005. The Task Force commends the Waste Board's effort to apply to active landfills the more comprehensive gas monitoring and control regulations currently applicable to closed landfills. This is an important step in not only protecting the public's health and safety and the environment, but also in meeting California's rigorous new greenhouse gas emissions law, Assembly Bill 32 (Chapter 488 of 2006 Statutes).

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, 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.

Mr. John Bell
October 30, 2006
Page 2

In support of more effectively implementing these regulations, the Task Force provides the following comment:

1. Title 27, Division 2, Chapter 3, Subchapter 4, Article 6, Section 20919, Page 1

Specific Request – Revise the section to read as follows: “Where the EA, the local fire control authority, **the local building authority**, or the CIWMB has reason to believe a hazard or nuisance is being or may be created by landfill gas, it shall so notify the operator. Thereafter, as directed by the EA, the local fire control authority, **the local building authority**, or the CIWMB, the site operator shall cause the site to be monitored for presence and movement of landfill gas and shall take necessary action to control such gas”.

Discussion – The above change is necessary for jurisdictions such as the County of Los Angeles and many cities within the County where the local building official is the responsible agency for ensuring buildings and structures built on or near disposal sites are protected against landfill gas intrusion.

We thank you for your consideration of this request. 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
Councilmember, City of Rosemead

LL:cw

P:\Sec\Task Force\Ltr\CIWMB-Gas Monitor Ltr.doc

cc: Each Member of the California Integrated Waste Management Board
Executive Director, California Integrated Waste Management Board (Mark Leary)
California Integrated Waste Management Board (Howard Levenson, Mark De Bie)
Each City Mayor in Los Angeles County
Each City Building Department in Los Angeles County
Each City Recycling Coordinator in Los Angeles County
County of Los Angeles Department of Health Services (Ken Murray, Pete Oda)
Each Member of the Los Angeles County Integrated Waste Management Task Force